

III. Review/Update to Original Plan

The City of Allentown's current "Regional Analysis of Impediments to Fair Housing Choice" was dated November 2013 and included Lehigh County, Northampton County, City of Allentown, City of Bethlehem and City of Easton. The participants review their progress in addressing the goals of the AI twice a year during the participants' preparation of the Annual Action Plan and the Consolidated Annual Performance Evaluation Reports (CAPER). The Regional Analysis of Impediments to Fair Housing Choice identified the following impediments, as well as created goals and strategies to address each impediment.

A. Summary of Impediments Allentown:

Impediment 1: Steering by Real Estate Agents

Actions - Outreach and training of Real Estate Agents: During the program year, NPLS, as part of the Fair Housing Consortium work, provided outreach and training to the Greater LV Board of Realtors. Seven training sessions were held, with 313 attendees and 175 brochures were give out. (Source: FY 2019 CAPER)

Impediment 2: Disparities in Mortgage Lending

Action - Worked with Fair Housing Consortium (members with Cities of Bethlehem, Easton and Counties of Northampton and Lehigh) to determine how to address, began discussions about how best to address. (Source: FY 2019 CAPER)

Impediment 3: Need for Increased Fair Housing Education

Action - Continued to fund the Fair Housing Consortium which works and funds North Penn Legal Services to provide fair housing educations throughout the year. The Consortium and NPLS provided 29 education sessions reaching over 850 persons. Finally, during Fair Housing month and beyond, the Consortium paid for an advertising campaign on area buses, promoting fair housing and noting where to go for help. (Source: FY 2019 CAPER)

Impediment 4: Need for Increased Coordination among Fair Housing Providers

Action - Continued to work with the Fair Housing Consortium, North Penn Legal Services and other fair housing providers to promote and coordinate fair housing education. Held quarterly meetings with the Consortium. In collaboration with the City of Bethlehem, coordinated NPLS to present a fair

housing seminar to the HUD funded housing providers who work in both cities. (Source: FY 2019 CAPER)

Impediment 6: Condition of Affordable Housing Stock

Action - Funded programs to improve condition of affordable housing stock within the CCI area. Funded programs to address housing stock. (Source: FY 2019 CAPER)

B. Summary of Impediments Bethlehem:

Impediment 1: Disparities in Mortgage Lending

Bethlehem joined other Lehigh Valley grantees in support of North Penn Legal Services, an organization that provides Fair Housing information and advocacy in the region, and continued to do so in the 2019 Program Year. While looking for ways to fund the recommended testing of lenders, North Penn Legal continued its public Fair Housing education efforts, including a bus advertising campaign and a Fair Housing Forum. Topics included information on filing complaints on housing issues, including possible lending discrimination. The City of Bethlehem continued to actively support those efforts with CDBG funds and by linking the City website to the North Penn Legal Services website for Fair Housing information. (Source: FY 2019 CAPER)

Impediment 2: Need for Increased Fair Housing Education

The City of Bethlehem continued to partner with the other Lehigh Valley grantees to support North Penn Legal Services' fair housing efforts and to plan improvements to North Penn's Lehigh Valley Fair Housing Project. These improvements center on reaching minority and disabled populations as well as landlords/property managers. Through the Project, during the 2019 Program Year, the communities of the Lehigh Valley, including the City of Bethlehem:

- Provided assistance to at least 60 residents to resolve potential fair housing violations (included at least 15 Bethlehem residents)
- Educated 500 residents, including at least 100 from Bethlehem, on fair housing rights and recourses
- Disseminated 800 copies of "The Right Stuff About Renting" to provide tenants with information about their rights, including those under fair housing laws
- Provided six training sessions for Realtors; Offered outreach sessions and other educational opportunities to promote Fair Housing Awareness Month in April

Impediment 3: Need for Increased Coordination among Fair Housing

The City of Bethlehem takes part in the Lehigh Valley Fair Housing Advisory Committee with other entitlement communities and fair housing organizations in the region to plan Fair Housing Awareness Day and other campaigns.

Impediment 6: Condition of Affordable Housing Stock

During 2019, Bethlehem continued activities that rehabilitated owner-occupied housing (29 units) and supported efforts to rehabilitate vacant units for sale to eligible households (15 units).

C. Summary of Impediments Easton:

The City of Easton completed the following activities to fulfill its obligation to Affirmatively Further Fair Housing during the 2017 Program Year that address fair housing impediments identified in the Lehigh Valley Analysis of Impediments to Fair Housing Choice (Source FY 2017 CAPER):

- Supported the Community Action Committee of the Lehigh Valley, Safe Harbor and the Third Street Alliance, all of which address the need for fair housing education and advocacy.
- Supported housing rehab and code enforcement programs, both of which address the impediment that poor housing conditions can present.
- Supported economic development and community improvements, including fire equipment, sewer reconstruction and neighborhood facilities, all of which address issues relating to quality of life and access to opportunity.
- Supported a variety of other public services that, likewise, address issues relating to quality of life and access to opportunity.

D. Summary of Impediments Northampton County:

Impediment 1: Disparities in Mortgage Lending

According to 2011 Home Mortgage Disclosure Act (HMDA) data, and after controlling for income level, Whites had the lowest mortgage denial rates in every income tier. In fact, low income Whites had a lower rate of mortgage denial than minorities of moderate and even high income levels. Blacks were denied loans at rates which increased with income: 28.1% for low income, 32.4% for moderate, and 34.5% at the higher income bracket. Moderate income Hispanics were denied loans at higher rates than those with low or high incomes. Denial rates for Asians were lower than for other minority groups but still much higher than Whites. Pacific Islanders had the highest denial rates of

any group at all income levels. The presence of disparities alone is not evidence enough to prove outright discrimination (there may be legitimate factors such as credit score, job history, and collateral that result in these loan denial patterns) but they do have the effect of limiting the housing choice of would-be borrowers.

North Penn Legal Services and the Community Action Committee of the Lehigh Valley are reviewing and meeting with banking officials. Two of our banking partners are undergoing a merger and the new banking firm will meet with our community action corporation over the number of loans and their locations. (Source FY 2018 CAPER)

Impediment 2: Need for Increased Fair Housing Education

The Lehigh Valley Fair Housing Project, undertaken by North Penn Legal Services, is roundly praised for its success at organizing events and sustaining education campaigns, including bus advertising. The project receives funding from each of the five local CDBG entitlement communities and is therefore a testament to the cooperative posture of these jurisdictions when it comes to fair housing education. As helpful as these efforts are, numerous indicators point to the need to do even more. In the fair housing survey conducted as part of this analysis, 46.3% of respondents claimed they did not know their fair housing rights; another 32.5% knew them "somewhat", leaving barely one in five residents aware of the protections afforded them by fair housing law. More than two-thirds of survey respondents stated they did not know where to file a fair housing complaint. Increased education is also needed for landlords and property owners. Of those respondents to the survey believing they had been discriminated against, 71.4% said the discrimination had been perpetrated by a landlord or property owner. Also, underscoring this need is the *Newell v. Traditions of Hanover* lawsuit where a property manager (responsible for multiple senior living facilities throughout Pennsylvania) is alleged to have discriminated against prospective tenants with disabilities.

Greater Lehigh Valley Realtors (GLVR) Presents Housing Equality Proclamation to Bradbury- Sullivan Center At the request of the Bradbury-Sullivan LGBT Community Center and Pennsylvania Youth Congress, the Greater Lehigh Valley Realtors readily agreed to join a coalition of organizations and associations in the promotion of anti-discriminatory practices in housing. GLVR has now added a New Director of Professional Development. This position at the Association, is responsible for the educational training and professional development needs of the membership, as well as the Professional Standards process. North Penn Legal Services also conducts landlord training on compliance with the fair housing act. (Source FY 2018 CAPER)

Impediment 3: Need for Increased Coordination among Fair Housing

The five entitlement communities participate in a fair housing partnership with North Penn Legal Services, which representatives roundly praise and see as having been successful. This partnership consolidates the fair housing work that otherwise would have been carried out by city and county staff in the five different jurisdictions. However, some other fair housing providers with a presence in the Lehigh Valley, particularly the various local human relations commissions, are not well integrated into this partnership. Local human relations commissions exist in Allentown, Bethlehem, and Easton, but their role is unclear and their effectiveness is varied, some depending completely on volunteer staffing. The efforts of these organizations are generally not concerted.

North Penn Legal Services and the Greater Lehigh Valley Realtors have increased their relationship with the new initiatives that GLVR has instituted this year. Additional land lord training events will also be held. (Source FY 2018 CAPER)

Impediment 4: Zoning Provisions Impacting People with Disabilities

The zoning ordinances adopted by Northampton County municipalities were generally determined to pose a high risk for limitation of housing choice and/or discrimination against people with disabilities. Great variation exists among the 37 zoning codes in place within the county. Many of these codes make it unreasonably difficult for persons with disabilities to make reasonable modifications to their property, restrict group homes from residential districts, require special permitting from them, impose spacing requirements between them, and restrict placement of group homes based on their requirements for onsite supportive services. Rather than include accessibility and other similar provisions in their individual codes, many municipalities rely instead upon the Pennsylvania Uniform Construction Code which applies statewide standards for all new construction, rehabilitation, and building inspections. The Uniform Construction Code is a noteworthy state law that provides an important backstop to the rights of people with disabilities, however, the presence of a state law may not be as effective at ensuring fair housing choice as would be the same provisions if codified locally.

The County interceded previously in several situations regarding placement of group homes. These actions were widely publicized and there has been no other questions regarding group homes. The County funds the Lehigh Valley Center for Individuals with Disabilities and they work with county municipalities on issues regarding accessibility. (Source FY 2018 CAPER)

Impediment 5: Zoning Provisions Restricting Residential Uses From Residential Districts

Many Northampton County municipalities restrict inherently residential land uses (such as shelters or residential treatment facilities) from some or all residential zones. The specific “inherently residential” uses are defined differently from one municipality to another, but in these cases, the zoning code clearly contemplates residential use (as opposed to only day use) of the facility type in question. At least 20 Northampton County municipalities have zoning ordinances with this type of restriction. The table on the previous page displays each municipality’s average total risk score; details of each individual ordinance and its position on these issues can be found in the appendix.

The County funds the Lehigh Valley Planning Commission which in turn has developed a set of revised Zoning ordinances as templates for each municipality to review modify as necessary and then adopt. (Source FY 2018 CAPER)

Impediment 6: Condition of Affordable Housing Stock

The Lehigh Valley is fortunate to have an ample supply of affordable housing. Especially when compared with the large surrounding cities like Philadelphia and New York, the relatively low cost of housing in the Lehigh Valley stands out. Though the region’s housing stock tends to be relatively affordable, it also tends to be old (over 50% was built prior to 1970), inaccessible to people with disabilities, expensive to maintain, and prone to falling into substandard condition. Over 5% of Lehigh Valley homeowners without a mortgage spend more than 30% of their income on housing expenses, reflecting high utility and maintenance costs, likely tied to the age of the housing stock. Stakeholders interviewed in the course of this analysis often referred to substandard conditions in the most affordable housing; several described problems with slumlords in their communities.

The County has added the City of Easton into their urban consortium which will allow for HOME entitlement funds towards programs regarding the housing stock. The County and Easton have Home Improvement programs and apply for additional funds towards improving the housing stock. The County provided rehabilitation financial assistance to twelve (12) single-family owner-occupied households during the FY 2018 period. (Source FY 2018 CAPER)

Impediment 7: Public Perceptions Regarding Transportation Connectivity

LANta, the Lehigh Valley’s public transportation system, does an admirable job of networking the community given the region’s three urban hubs and large rural areas. Concepts such as the Alburtis/Macungie Flex Zone are expanding LANta’s Services in a careful, cost-controlled manner. In the fair housing survey

conducted as part of this analysis, a remarkable 73.1% of respondents said that public transportation was available in their neighborhood. However, only 45.5% said that public transportation provided access to major employers, and only 23.1% believed that LANTa service schedules coincided with their work schedules. It is worth noting that 22.8% of respondents did not know whether public transportation was available to major employers and 47% did not know whether transit scheduled coincided with their work schedules.

The County continued to participate and collaborate with its partners to connect rider demand to scheduling and routing. (Source FY 2018 CAPER)

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IV. Impediments to Fair Housing 2020

Impediments to fair housing choice are defined as:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin that restrict housing choices or the availability of housing choice
- Any actions, omissions, or decisions that have this effect. In order to determine if any impediments to fair housing choice exist, interviews and meetings were conducted, surveys were distributed, Census data was reviewed, and an analysis of the fair housing complaints in the area was undertaken.

The following section will identify impediments to fair housing choice in the Lehigh Valley.

A. Fair Housing Complaints:

1. North Penn Legal Services

North Penn Legal Services (NPLS) is a nonprofit organization providing civil legal aid to low-income residents of Northeastern Pennsylvania. NPLS provides legal assistance so that people can know their rights and receive free legal representation in non-criminal matters such as eviction from housing, discrimination, family law, and consumer protection issues. The mission of North Penn Legal Services (NPLS) is to provide civil legal representation to low-income people and ensure equal access to justice for all.

North Penn Legal Services
559 Main Street, Suite 200
Bethlehem, PA 18018-5881
610-317-8757
www.northpennlegal.org

NPLS is the designated area fair housing agency and is a subrecipient of CDBG funds for fair housing activities from all of the entitlements. The partners direct all fair housing complaints to NPLS for consultation.

2. Housing Equality Center of Pennsylvania

The Housing Equality Center of Pennsylvania (formerly Fair Housing Council of Suburban Philadelphia) is America's oldest fair housing council. The Housing Equality Center's service area includes the Pennsylvania counties of Bucks, Chester, Delaware, Lehigh, Montgomery, Northampton and

Housing Equality
Center of Pennsylvania
PO Box 558
Fort Washington, PA 19034
267-419-8918
866-540-FAIR
www.equalhousing.org

Philadelphia. The organization's education and technical assistance programs support housing professionals throughout Pennsylvania.

The Housing Equality Center (HCE) offers a variety of programs and services to the general public to ensure that consumers have access to housing and understand their rights under fair housing laws. Additional programs and services are available to ensure that housing professionals understand and comply with fair housing laws. The Housing Equality Center provides:

- Counseling and conducts testing investigations to help housing discrimination victims.
- Education and training programs for housing professionals, nonprofits, housing authorities and others to promote compliance with fair housing laws and to prevent discrimination.
- Publications, fact sheets and resources to educate the public and housing professionals about fair housing.

HCE has received CDBG funds from the partner entitlements in the past.

3. Pennsylvania Human Relations Commission

The Pennsylvania Human Relations Commission (PHRC) enforces state laws that prohibit discrimination under the Pennsylvania Human Relations Act, and the Pennsylvania Fair Education Opportunities Act. The Pennsylvania Fair Education Opportunities Act prohibits discriminatory practices based on race, religion, color, ancestry, national origin, or sex within education institutions. The Pennsylvania Human Relations Act prohibits certain discriminatory practices based on race, religious creed, color, ancestry, national origin, or age by employers, employment agencies, or labor organizations. Additionally, the Pennsylvania Human Relations Act created the PHRC under the Governor's office, with defined powers and a mission, which is, *"to promote equal opportunity for all and enforce Pennsylvania's civil rights laws that protect people from unlawful discrimination."* (PHRC 2014-2017 Strategic Plan).

Pennsylvania Human
Relations Commission
333 Market Street, 8th Floor
Harrisburg, PA 17101-2210
(717) 787-4410
www.phrc.pa.gov

The PHRC main office is in Harrisburg, doubling as a regional office, along with two other regional offices in Philadelphia and Pittsburgh. PHRC investigates employment discrimination complaints on behalf of the U.S. Equal Employment Opportunity Commission (EEOC) and housing discrimination complaints on behalf of the U.S. Department of Housing and

Urban Development (HUD). These partnerships protect the rights of complainants under both state and federal law.

The law also empowers the commission to educate the public in order to prevent discrimination and foster equal opportunity; and to address incidents of bias that may lead to tension between racial, ethnic and other groups.

4. Fair Housing Assistance Program (FHAP) Agencies

The Fair Housing Assistance Program offers grants to state and local agencies that have sufficiently demonstrated to HUD that they support or enforce a fair housing law that is substantially equivalent to the Fair Housing Act. FHAP agencies carryout fair housing activities such as enforcement and education in order to protect families and individuals who believe that they have been the victims of housing discrimination.

The Lehigh Valley is supported by the following FHAPs:

- Pennsylvania Human Relations Commission
- North Penn Legal Services
- Housing Equality Center of Pennsylvania

5. Fair Housing & Equal Opportunity (FHEO-HUD)



The U.S. Department of Housing and Urban Development's (HUD's) Office of Fair Housing & Equal Opportunity (FHEO) receives complaints regarding alleged violations of the Fair Housing Act. According to the HUD FHEO complaint tracking system (TEAPOTS) the following complaints were filed from January 1, 2009 until May 30, 2019:

HUD REPORTED FAIR HOUSING COMPLAINTS 2009 - 2019

City of Allentown - January 1, 2009 - May 30, 2019						
Violation City	Violation State and County	Filing Date	Closure Date	Closure Reason	Basis	Issues
Allentown	Pennsylvania - Lehigh	05/15/14	09/03/15	ALJ consent order entered after issuance of charge	Familial Status	Discriminatory refusal to negotiate for rental; Discriminatory advertising, statements and notices; Discrimination in terms/condition/privileges relating to rental
Allentown	Pennsylvania - Lehigh	09/11/15	01/24/17	Conciliation/settlement successful	Race, National Origin	Discriminatory terms, conditions, privileges, or services and facilities; redlining - insurance
Allentown	Pennsylvania - Lehigh	03/20/09	05/08/09	Conciliation/settlement successful	Race	Discrimination in terms/conditions/privileges relating to rental

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Allentown	Pennsylvania - Lehigh	05/27/09	12/11/09	No cause determination	Disability	Discriminatory refusal to rent and negotiate for rental
Allentown	Pennsylvania - Lehigh	08/03/10	05/20/11	No cause determination	Race, Familial Status	Discrimination in terms/conditions/ privileges relating to rental
Allentown	Pennsylvania - Lehigh	02/24/11	06/30/11	No cause determination	Race	Discriminatory refusal to rent and negotiate for rental
Allentown	Pennsylvania - Lehigh	04/12/11	06/30/11	No cause determination	Disability	Discriminatory terms, conditions, privileges, or services and facilities
Allentown	Pennsylvania - Lehigh	07/05/11	09/14/11	No cause determination	Sex, Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/ privileges relating to rental
Allentown	Pennsylvania - Lehigh	11/16/11	07/09/12	Conciliation/settlement successful	Retaliation	Discrimination in terms/conditions/ privileges relating to rental
Allentown	Pennsylvania - Lehigh	04/17/12	06/29/12	No cause determination	National Origin	Discrimination in terms/conditions/ privileges relating to rental
Allentown	Pennsylvania - Lehigh	12/07/12	02/26/13	No cause determination	Disability	Discrimination in terms/conditions/ privileges relating to rental
Allentown	Pennsylvania - Lehigh	01/29/14	06/02/14	Complaint withdrawn by complainant after resolution	Race	Discriminatory refusal to rent
Allentown	Pennsylvania - Lehigh	04/15/14	06/20/14	Complaint withdrawn by complainant after resolution	Disability	Failure to make reasonable accommodation
Allentown	Pennsylvania - Lehigh	11/05/14	02/11/15	No cause determination	Race	Discriminatory advertising, statements, and notices
Allentown	Pennsylvania - Lehigh	03/24/15	07/14/15	Complainant failed to cooperate	Race, Disability	Discriminatory refusal to rent
Allentown	Pennsylvania - Lehigh	05/11/15	09/14/15	No cause determination	Religion	Discriminatory terms, conditions, privileges, or services and facilities
Allentown	Pennsylvania - Lehigh	06/12/15	01/14/16	No cause determination	Race	Discriminatory refusal to rent
Allentown	Pennsylvania - Lehigh	07/23/15	09/17/15	No cause determination	Disability	Discriminatory refusal to rent
Allentown	Pennsylvania - Lehigh	08/06/15	01/14/16	No cause determination	Race, Disability	Discriminatory terms, conditions, privileges, or services and facilities
Allentown	Pennsylvania - Lehigh	10/19/15	12/23/15	Conciliation/settlement successful	Disability	Otherwise deny or make housing unavailable; Failure to make reasonable accommodation

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Allentown	Pennsylvania - Lehigh	02/19/16	05/12/16	Conciliation/settlement successful	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation
Allentown	Pennsylvania - Lehigh	03/09/16	06/02/16	Complainant failed to cooperate	Disability	Otherwise deny or make housing unavailable; Failure to make reasonable accommodation
Allentown	Pennsylvania - Lehigh	04/21/16	05/31/16	Conciliation/Settlement successful	National Origin, Disability	Discriminatory terms, conditions, privileges, or services and facilities
Allentown	Pennsylvania - Lehigh	10/18/16	03/30/17	Complaint withdrawn by complainant after resolution	Sex	Discriminatory in terms/conditions/ privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)
Allentown	Pennsylvania - Lehigh	05/23/17	01/18/18	No cause determination	Disability	Failure to make reasonable accommodation
Allentown	Pennsylvania - Lehigh	06/26/17	02/13/18	No cause determination	Race	Discriminatory terms, conditions, privileges, or services and facilities
Allentown	Pennsylvania - Lehigh	07/20/17	09/21/17	Complaint withdrawn by complainant after resolution	National Origin, Disability	Discriminatory refusal to negotiate for rental; Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation

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City of Bethlehem - January 1, 2009 - May 30, 2019						
Violation City	Violation State and County	Filing Date	Closure Date	Closure Reason	Basis	Issues
Bethlehem	Pennsylvania - Northampton	03/27/19	-	-	Familial Status	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)
Bethlehem	Pennsylvania - Northampton	02/03/11	06/23/11	Conciliation/Settlement successful	Disability	Failure to make reasonable accommodation
Bethlehem	Pennsylvania - Northampton	06/10/16	01/13/17	Conciliation/Settlement successful	National Origin	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable
Bethlehem	Pennsylvania - Dauphin	07/18/16	09/15/16	Complaint withdrawn by complainant after resolution	Sex	Discriminatory terms, conditions, privileges, or services and facilities
Bethlehem	Pennsylvania - Lehigh	05/11/09	09/24/09	No cause determination	National Origin	Discriminatory refusal to negotiate for rental
Bethlehem	Pennsylvania - Lehigh	09/16/10	04/29/11	No cause determination	Disability	Discrimination in terms/conditions/privileges relating to rental
Bethlehem	Pennsylvania - Lehigh	01/15/15	07/14/15	No cause determination	National Origin	Discriminatory refusal to rent
Bethlehem	Pennsylvania - Lehigh	08/07/17	11/01/17	Dismissed for lack of jurisdiction	Race, National Origin	Discriminatory terms, conditions, privileges, or services and facilities
Bethlehem	Pennsylvania - Northampton	01/06/09	03/15/10	No cause determination	Race	Discriminatory terms, conditions, privileges, or services and facilities
Bethlehem	Pennsylvania - Northampton	05/29/10	03/17/11	No cause determination	Disability	Failure to make reasonable accommodation
Bethlehem	Pennsylvania - Northampton	03/08/12	05/22/12	No cause determination	Disability	Failure to make reasonable accommodation
Bethlehem	Pennsylvania - Northampton	09/24/12	01/24/13	Conciliation/settlement successful	Sex, Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation
Bethlehem	Pennsylvania - Northampton	10/22/13	11/20/13	Complaint withdrawn by complainant after resolution	Disability	Failure to make reasonable accommodation
Bethlehem	Pennsylvania - Northampton	12/22/14	05/18/15	No cause determination	National Origin	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental
Bethlehem	Pennsylvania - Northampton	06/07/16	03/30/17	No cause determination	Race	Discriminatory refusal to rent
Bethlehem	Pennsylvania - Northampton	01/25/18	04/11/18	Complainant failed to cooperate	Disability	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation

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City of Easton and Northampton County - January 1, 2009 - May 30, 2019						
Violation City	Violation State and County	Filing Date	Closure Date	Closure Reason	Basis	Issues
Bangor	Pennsylvania - Northampton	05/18/11	12/15/11	ALJ consent order entered after issuance of charge	Familial Status	Discriminatory advertising, statements, and notices
Mount Bethel	Pennsylvania - Northampton	04/12/18	-	-	Disability, Retaliation	Discrimination in terms/conditions/ privileges relating to rental; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation
Bangor	Pennsylvania - Northampton	10/01/18	-	-	Disability	Otherwise deny or make housing unavailable; Failure to make reasonable accommodation
Bath	Pennsylvania - Northampton	03/08/13	04/21/14	Complaint withdrawn by complainant after resolution	Familial Status	Discrimination in terms/conditions/ privileges relating to rental
Easton	Pennsylvania - Northampton	11/12/10	05/11/11	No cause determination	Disability	Discrimination in the making of loans
Easton	Pennsylvania - Northampton	08/17/11	12/05/11	Conciliation/settlement successful	National Origin	Discriminatory terms, conditions, privileges, or services and facilities
Easton	Pennsylvania - Northampton	10/20/11	04/18/12	No cause determination	Disability	Discriminatory refusal to rent; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation
Easton	Pennsylvania - Northampton	09/24/12	02/25/13	No cause determination	National Origin, Retaliation	Discrimination in terms/conditions/ privileges relating to rental
Easton	Pennsylvania - Northampton	10/01/14	11/17/14	Complaint withdrawn by complainant after resolution	Disability	Discriminatory terms, conditions, privileges, or services and facilities
Easton	Pennsylvania - Northampton	07/10/15	09/10/15	Conciliations/settlement successful	Race, Sex	Discrimination in the selling of residential real property
Easton	Pennsylvania - Northampton	10/23/15	03/28/16	Complaint withdrawn by complainant after resolution	Race, Familial Status	Discrimination in terms/conditions/ privileges relating to rental
Easton	Pennsylvania - Northampton	10/02/17	-	-	Race	Other discriminatory acts
Easton	Pennsylvania - Northampton	02/26/18	11/16/18	Complaint withdrawn by complainant without resolution	Familial Status	Discriminatory refusal to sell; Discriminatory advertisement - sale
Easton	Pennsylvania - Northampton	03/26/18	05/16/19	No cause determination	Familial Status	Discriminatory refusal to sell; Discrimination in the selling of residential real property; Discrimination in services and facilities relating to sale
Easton	Pennsylvania - Northampton	08/17/15	02/17/16	No cause determination	Race, Familial Status	Discriminatory refusal to rent

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Easton	Pennsylvania - Northampton	07/10/15	08/27/15	Conciliation/settlement successful	Race, Sex	Discrimination in the selling of residential real property
Nazareth	Pennsylvania - Northampton	04/13/17	05/25/17	Conciliation/settlement successful	Disability	Discriminatory refusal to rent and negotiate for rental; Failure to make reasonable accommodation
Stockertown	Pennsylvania - Northampton	09/26/13	12/03/13	Complaint withdrawn by complainant after resolution	Religion	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental
Windgap	Pennsylvania - Northampton	04/22/15	03/01/16	No cause determination	Disability	Discriminatory refusal to rent

The majority of fair housing complaints over the past ten (10) years for the area covered disability and race. The majority of reported issues specific to disability were the "failure to make reasonable accommodations." The majority of reported issues specific to race were "discrimination in terms/conditions/privileges relating to rental."

National Trends

The U.S. Department of Housing and Urban Development (HUD) funds the Office of Fair Housing and Equal Opportunity (FHEO), whose mission is to eliminate discrimination, promote economic opportunity, and achieve diversity. FHEO leads the nation in the enforcement, administration, development, and public understanding of Federal fair housing policies and laws. FHEO enforces laws that protect people from discrimination on the basis of race, color, religion, sex, national origin, disability, and familial status. FHEO releases annual reports to Congress, which provide information regarding complaints received during the particular year. The following table highlights the frequency of such housing complaints for the years of 2014, 2015, 2016, and 2017 (most recent year available) organized by basis of complaint. Note, the percentages for each year do not equal 100% and the number of complaints each year do not equal the total complaints across all areas. This is because there is often more than one basis for the filing of a fair housing complaint.

HUD and FHAP Housing Complaints Nationwide

Basis	FY 2014		FY 2015		FY 2016		FY 2017	
	Number of Complaints	% of Total	Number of Complaints	% of Total	Number of Complaints	% of Total	Number of Complaints	% of Total
Disability	4,621	41%	4,605	42%	4,908	45%	4,865	59%
Race	2,383	21%	2,291	21%	2,154	20%	2,132	26%

Familial Status	1,051	9%	1,031	9%	882	8%	871	11%
National Origin	1,067	9%	898	8%	917	8%	834	10%
Sex	879	8%	915	8%	800	7%	826	10%
Religion	223	2%	225	2%	204	2%	800	10%
Color	146	1%	151	1%	143	1%	232	3%
Retaliation	867	8%	832	8%	785	7%	192	2%
Number of Complaints filed	11,237		10,948		10,793		8,186	

Source: HUD FY 2014-2017 Annual Reports on Fair Housing

Note: Complaints often allege more than one (1) basis of discrimination, and each base is counted as a complaint.

The majority of the HUD complaints filed nationwide in 2017 were on the basis of disability, making up 59% of all complaints received. Race was next, making up 26% of all complaints, followed by familial status at 11%.

The housing complaints filed in the area were consistent with the most common causes for complaints across the nation.

6. Local Human Rights Commissions

The cities of Allentown, Bethlehem, and Easton have ordinances concerning discrimination and the formation of Human Relations Commissions. The City of Allentown recognizes the following protected classes, "race, color, religion, national origin, ancestry or place of birth, sex, gender identity, sexual orientation, disability, marital status, age or use of a guide or support animal because of blindness, deafness or physical disability." (Source: City of Allentown Codified Ordinances Title Eleven Article 181) The City of Bethlehem recognizes the following protected classes, "race, color, sex, religion, ancestry, genetic information, national origin, sexual orientation, gender identity or expression, familial status, marital status, age, mental or physical disability, use of guide or support animals and/or mechanical aids." (Source: City of Bethlehem Codified Ordinances Article 145) The City of Easton recognizes the following protected classes, "race, color, sex, religion, ancestry, national origin, sexual orientation, gender identity or expression, familial status, marital status, age, mental or physical disability, use of guide or support animals and/or mechanical aids." (Source: City of Easton Codified Ordinances Part 1 Chapter 79)

7. Housing and Human Services Agencies

Agencies offering housing and human services within the County and the Cities of Allentown, Bethlehem, and Easton were interviewed in order to obtain their input and insight into potential impediments to fair housing. The following agencies participated in the information gathering through roundtable discussions, individual meetings, or through surveys:

- Northampton County staff
- City of Allentown staff
- City of Bethlehem staff
- City of Easton staff
- Northampton County Housing Authority
- City of Allentown Housing Authority
- City of Bethlehem Housing Authority
- City of Easton Housing Authority
- Everlasting Life Ministries Inc.
- Housing Association & Development Corp
- ArteFact
- The Baum School of Art
- Boys & Girls Club of Allentown
- Community Services for Children, Inc
- Grace Montessori School
- Greater Valley YMCA, Allentown Branch
- Lehigh Conference of Churches
- Lehigh Valley Children's Centers Inc
- The Literacy Center
- The Neighborhood Center
- Neighborhood Housing Services of the LV
- Valley Youth House Committee, Inc.
- Youth Education in the Arts
- Allentown Rescue Mission
- Community Action Development of Allentown
- New Bethany Ministries
- Resources for Human Development
- Salvation Army
- Family Connections
- Easton Area Neighborhood Center
- Easton Area Community Center
- Easton Boys and Girls Club
- Meals on Wheels
- Second Harvest Food Bank
- Miracle League of Northampton County
- LINC

- BB&T Bank
- Northampton Community College
- Moravian College
- Lehigh University
- Old Allentown Preservation Association
- Lehigh Valley Workforce Investment Board, Inc.
- Communities In Schools of the Lehigh Valley

Each of these agencies provided feedback on their and their clients' experiences concerning housing-related issues in Northampton County, and the Cities of Allentown, Bethlehem, and Easton. Below is a list of key points from each of the meetings.

- Need for affordable housing
- Need for supportive services
- Need for employment opportunities
- Need for public transportation

Many agencies also provided suggestions of how to address the identified areas of inequality or discrimination in the City. Commonly suggested strategies to further fair housing in the City are included below:

- Provide more affordable housing
- Provide financial assistance to make housing more affordable
- Provide education and outreach on fair housing

B. Public Sector:

The Analysis of Impediments examines public policies of the jurisdiction and the impact of those policies on fair housing choice. The local units of government control land use and development through their respective comprehensive plans, zoning regulations, subdivision regulations, and other laws and ordinances passed by the municipal governing bodies. These regulations and ordinances govern the types of housing that may be constructed, the density of housing, and the various residential uses in a community. Local officials and policies determine the community's commitment to housing goals and objectives; therefore, determining if fair housing is to be promoted or not.

This section of the Analysis of Impediments evaluates the area's policies to determine if there is a commitment to affirmatively further fair housing.

1. CDBG Program

City of Allentown

The City of Allentown is an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant Program (CDBG). The City will receive \$2,305,197 in CDBG funds for FY 2020. The City anticipates that CDBG funding levels will remain relatively level over the FY 2020-2024 Five Year Consolidated Plan period.

The City annually allocates its CDBG funds to a number of eligible projects such as: infrastructure improvement, homeownership, homeless prevention and services, housing rehabilitation, new housing construction, affordable housing navigation, recreation facility, youth program, and economic development activities. Each project must meet one of the National Objectives: Benefit to low- and moderate- income (LMI) persons; Aid in the prevention or elimination of slums or blight; or Meet a need having a particular urgency (referred to as urgent need). Many of the projects specifically focus on increasing the supply of quality affordable housing, as well as promoting fair housing choice in the City.

The City of Allentown's FY 2020-2024 Five Year Consolidated Plan identified the following strategies to address the priority needs in the City:

#	Goal Name	Category	Needs Addressed
1	Rehabilitation of Owner-Occupied Homes	Affordable Housing	Create and Preserve Affordable Housing
2	New Affordable Ownership Housing	Affordable Housing	Create and Preserve Affordable Housing Improve Access to Essential Services & Amenities
3	New Affordable Rental Housing	Affordable Housing Public Housing	Create and Preserve Affordable Housing Support Public Housing
4	Homeless Support Activities	Affordable Housing Homeless	Create and Preserve Affordable Housing Reduce Homelessness Improve Access to Essential Services & Amenities
5	Public Infrastructure Improvements	Non-Housing Community Development	Improve Mobility & Connectivity Improve Living Systems

#	Goal Name	Category	Needs Addressed
6	Public Safety Goals	Public Safety	Build a Strong, Resilient and Diversified Economy Improve Mobility & Connectivity Improve Living Systems
7	Public Facilities Improvements	Public Facilities	Improve Living Systems
8	Special Needs Goals (Non-Homeless)	Affordable Housing Non-Homeless Special Needs	Improve Access to Essential Services & Amenities Improve Mobility & Connectivity
9	Public Services	Public Services	Improve Access to Essential Services & Amenities
10	Economic Development/Job Creation	Economic Development	Build a Strong, Resilient and Diversified Economy Improve Mobility & Connectivity
11	Planning and Administration	Planning and Administration	-

1	Goal Name	Rehabilitation of Owner-Occupied Homes
	Goal Description	The City will annually implement activities to maintain and improve the condition of the housing stock to meet or exceed current code standards, improve energy efficiency, and comply with the City's Property Maintenance Code. Projects that will address this goal include the Hazard Elimination Program to repair or replace major housing systems that have failed and are posing a threat to the owner's health and safety.
2	Goal Name	New Affordable Ownership Housing
	Goal Description	The City will implement and subcontract several activities to support the creation of new affordable ownership housing: <ul style="list-style-type: none"> • First-time homebuyer education and counseling; • Down payment Assistance; and • Subsidizing the development of new affordable ownership housing.
3	Goal Name	New Affordable Rental Housing
	Goal Description	The City's support of new affordable rental housing will focus on subsidies to housing developers, including the Allentown Housing Authority. HOME funds will generally support this activity with leveraged resources including the Low-Income Housing Tax Credit Program and Federal Home Loan Bank programs.
4	Goal Name	Homeless Support Activities
	Goal Description	The City of Allentown will use a variety of different programs as well as funding sources to help serve the social service and housing needs of the City's homeless population.

5	Goal Name	Public Infrastructure Improvements
	Goal Description	The City will undertake a series of public infrastructure projects over the course of this Plan, including road reconstruction, water and sewer improvements, and lighting improvements. Given the nature of these types of improvements, the City anticipates benefitting as many as 25,000 people under this goal over the course of the Plan.
6	Goal Name	Public Safety Goals
	Goal Description	This goal will primarily focus on the demolition or stabilization of buildings that are posing a threat to the public's health and safety. The number of demolished properties is expected to be approximately 90 over the course of this Plan.
7	Goal Name	Public Facilities Improvements
	Goal Description	Public facilities are defined as those buildings or spaces that serve the residents of Allentown. Often public facilities are owned and operated by the City, in the case of parks and senior centers. However, vital public facilities are also owned and operated by nonprofit organizations. Examples might include the YMCA and the Boys and Girls Club. In order to be eligible for assistance from the CDBG program, the facility must primarily benefit low- and moderate-income residents.

City of Bethlehem

The City of Bethlehem is an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant Program (CDBG). The City will receive \$1,354,602 in CDBG funds for FY 2020. The City anticipates that CDBG funding levels will remain relatively level over the FY 2020-2024 Five Year Consolidated Plan period.

The City annually allocates its CDBG funds to a number of eligible projects such as: park improvements, owner occupied rehab, first time home buyer outreach, fair housing legal services, rental assistance, capital improvement projects, and youth programs. Each project must meet one of the National Objectives: Benefit to low- and moderate- income (LMI) persons; Aid in the prevention or elimination of slums or blight; or Meet a need having a particular urgency (referred to as urgent need). Many of the projects specifically focus on increasing the supply of quality affordable housing, as well as promoting fair housing choice in the City.

The City of Bethlehem's FY 2020-2024 Five Year Consolidated Plan identified the following priority needs to be addressed in the City:

- Improve existing housing stock, both rental and owner-occupied
- Increase home ownership opportunities
- Improve public spaces, including parks, streets and other infrastructure
- Enhance public safety through services and environmental improvements such as lighting

- Support economic development, including infrastructure improvements to commercial areas serving nearby residential neighborhoods and through support for commercial facade improvements
- Support neighborhood stabilization efforts and blight elimination initiatives through increased code enforcement and property clearance or rehab programs
- Support a wide range of eligible public services and facilities, including affordable child care, before- and after-school programming, job readiness services, mental health services, child nutrition services, financial literacy programs (including foreclosure prevention) and food pantries and homeless shelters

City of Easton and Northampton County

Northampton County is an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant Program (CDBG) and HOME Investment Partnerships Program (HOME). The City of Easton, a previous federal CDBG entitlement community, and Northampton County entered into a cooperation agreement on 8/16/2018 that established the City of Easton as an "opt in" participant in the urban county entitlement program. The County will receive \$2,212,380 in CDBG funds for FY 2020. The County anticipates that CDBG funding levels will remain relatively level over the FY 2019-2023 Five Year Consolidated Plan period.

The County annually allocates its CDBG funds to a number of eligible projects such as: public facility/infrastructure improvements, public services, the removal of slum and blight, and housing activities. Additional projects are available to eligible low-mod income beneficiaries. Each project must meet one of the National Objectives: Benefit to low- and moderate-income (LMI) persons; Aid in the prevention or elimination of slums or blight; or Meet a need having a particular urgency (referred to as urgent need). Many of the projects specifically focus on increasing the supply of quality affordable housing, as well as promoting fair housing choice in the County.

Northampton County's FY 2019-2023 Five Year Consolidated Plan identified the following six (6) strategies to address the priority needs in the County:

Housing Strategy Priority Need: There is a need for decent, safe, sanitary, and affordable housing for homebuyers, homeowners, and renters.

Goals:

- HS-1 Housing Support – Assist low- and moderate-income households to access decent, safe, sanitary, and affordable housing for rent or for sale through housing counseling, down payment and closing cost assistance.
- HS-2 Housing Construction – Encourage the construction of new affordable housing units throughout the County for both owners and renters.
- HS-3 Housing Rehabilitation – Conserve and rehabilitate existing affordable housing units occupied by owners and renters in the County by addressing code violations, emergency repairs and handicap accessibility.

Homeless Strategy Priority Need: There is a need for housing for homeless persons and persons at-risk of becoming homeless.

Goals:

- HO-1 Housing – Support the Continuum of Care's efforts to provide emergency shelter, transitional housing, rapid rehousing, utility support, permanent supportive housing, and other permanent housing opportunities.
- HO-2 Operation/Support – Assist housing providers who operate or provide housing support services for the homeless and persons or families at-risk of becoming homeless.

Other Special Needs Strategy Priority Need: There is a need for housing, services, and facilities for persons with special needs.

Goals:

- SN-1 Housing – Support an increase in the supply of accessible, decent, safe, sanitary, and affordable housing for the elderly, persons with disabilities, persons with HIV/AIDS, victims of domestic violence, persons with alcohol/drug dependency, and persons with other special needs, through rehabilitation of existing buildings and new construction of housing.
- SN-2 Social Services – Support social service programs and facilities for the elderly, persons with disabilities, persons with HIV/AIDS, victims of domestic violence, persons with alcohol/drug dependency, and persons with other special needs.

Community Development Strategy Priority Need: There is a need to improve the community facilities, infrastructure, public services, and quality of life in the County.

Goals:

- CD-1 Community Facilities and Infrastructure – Improve the County's public facilities and infrastructure through rehabilitation, reconstruction, and new construction.
- CD-2 Public Safety and Services – Improve and enhance public safety, public services, and public programs.
- CD-3 Connectivity – Improve connectivity throughout the County and surrounding municipalities through physical, visual, transportation, and accessibility improvements.
- CD-4 Clearance/Demolition – Remove and eliminate slum and blighting conditions throughout the County.

Economic Development Strategy Priority Need: There is a need to encourage employment and to promote economic opportunities in the County.

Goals:

- ED-1 Employment – Support and encourage job creation, job retention, and job training opportunities.
- ED-2 Development – Support business and commercial growth through expansion and new development.
- ED-3 Redevelopment – Plan and promote the development, redevelopment, and revitalization of vacant commercial and industrial sites and buildings.
- ED-4 Financial Assistance – Support and encourage new economic development through local, state, and federal tax incentives and programs such as: Tax Incremental Financing (TIF); Tax Abatement (LERTA); Payment in Lieu of Taxes (Pilot); Enterprise Zones/Entitlement Communities; Section 108 Loan Guarantees; Economic Development Initiative (EDI) funds; etc.
- ED-5 Access to Transportation – Support the expansion of public transportation and access to bus and automobile service to assist the transportation needs for employment and job training opportunities.

Administration, Planning, and Management Strategy Priority Need: There is a need for planning, administration, management, and oversight of federal, state, and local funded programs.

Goals:

- AM-1 Overall Coordination – Provide program management and oversight for the successful administration of federal, state, and local funded programs, including planning services for special studies,

environmental clearance, fair housing activities, and compliance with all federal, state, and local laws and regulations.

2. HOME Program

City of Allentown

The City of Allentown is an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community HOME Investment Partnerships Program (HOME). The City will receive \$975,569 in HOME funds for FY 2020. The City anticipates that HOME funding levels will remain relatively level over the FY 2020-2024 Five Year Consolidated Plan period.

The City annually allocates its HOME funds to eligible low-mod households for affordable housing activities such as: homeownership and new affordable housing construction.

City of Bethlehem

The City of Bethlehem is an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community HOME Investment Partnerships Program (HOME). The City will receive \$975,569 in HOME funds for FY 2020. The City anticipates that HOME funding levels will remain relatively level over the FY 2020-2024 Five Year Consolidated Plan period.

The City annually allocates its HOME funds to eligible low-mod households for affordable housing activities such as: owner occupied rehab, vacant property rehab, and down payment assistance.

Northampton County

Northampton County is an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community HOME Investment Partnerships Program (HOME). The County will receive \$647,231 in HOME funds for FY 2020. The County anticipates that HOME funding levels will remain relatively level over the FY 2020-2024 Five Year Consolidated Plan period.

The County annually allocates its HOME funds to eligible low-mod households for affordable housing activities such as: CHDO projects; owner-occupied housing rehabilitation; and affordable housing acquisition.

3. Emergency Solutions Grant (ESG) Funds

City of Allentown

The City of Allentown is an entitlement community under the Emergency Solutions Grant (ESG) Program. The City will receive \$198,373 in FY 2020 ESG funds. ESG funds received by the City are awarded to homeless service provider agencies that serve the Lehigh Valley Area with projects such as: rapid rehousing; street outreach; homelessness prevention; emergency shelter; and Homeless Management Information System (HMIS).

City of Bethlehem

The City of Bethlehem is not an entitlement community under the Emergency Solutions Grant (ESG) Program. The City is part of the Eastern PA Continuum of Care, which is part of the Balance of State CoC. The Balance of State is split into five regional groups, called RHABs, each consisting of the governance structure for a CoC. The Lehigh Valley RHAB addresses issues related to homelessness in both Lehigh and Northampton Counties.

Northampton County

Northampton County is an entitlement community under the Emergency Solutions Grant (ESG) Program. The County will receive \$184,798 in FY 2020 ESG funds. ESG funds received by the County are awarded to homeless service provider agencies that serve the Lehigh Valley Area with projects such as: rapid rehousing; street outreach; homelessness prevention; emergency shelter; and Homeless Management Information System (HMIS).

4. Housing Opportunity for Persons with AIDS (HOPWA) Funds

The City of Allentown is an entitlement community Housing Opportunities for Persons With AIDS (HOPWA) Program. The City will receive \$486,961 in FY 2020 HOPWA funds. HOPWA funds are assigned to the Commonwealth of Pennsylvania's Department of Community and Economic for activities that address the housing needs of people living with HIV/AIDS.

The Cities of Bethlehem and Easton, and Northampton County do not receive HOPWA funds.

5. Other Funds

City of Allentown

The City of Allentown will use the following funds to address its community development and housing needs:

- CDBG-CV
- HUD Lead Hazard Reduction Grant
- Low-Income Housing Tax Credit Program (LIHTC)
- Pennsylvania Housing Finance Agency (PFHA)
- HUD Section 202 Housing for the Elderly
- HUD Section 811 Housing for the Disabled
- HUD Public and Indian Housing
- Pennsylvania Department of Community and Economic Development (DCED)
- Federal Home Loan Bank (FHLB)
- Financial Institutions – Several local financial institutions have developed flexible underwriting criteria to encourage homeownership

City of Bethlehem

The City of Bethlehem will use the following funds to address its community development and housing needs:

- CDBG-CV
- HUD Lead Hazard Reduction Grant
- Low-Income Housing Tax Credit Program (LIHTC)
- Pennsylvania Housing Finance Agency (PFHA)
- HUD Section 202 Housing for the Elderly
- HUD Section 811 Housing for the Disabled
- HUD Public and Indian Housing
- Pennsylvania Department of Community and Economic Development (DCED)
- Federal Home Loan Bank (FHLB)
- Financial Institutions – Several local financial institutions have developed flexible underwriting criteria to encourage homeownership

Northampton County

Northampton County will use the following funds to address its community development and housing needs: HUD Lead Grant and PA PHARE Housing Grant.

CDBG and HOME subrecipients are encouraged to leverage additional resources (such as private, state and local funds) for projects. Subrecipients are required to submit matching fund sources in their CDBG/HOME applications. The County assists subrecipients to match federal grants with the following private, state and other funds:

- CDBG-CV
- HUD Lead Hazard Reduction Grant
- Low-Income Housing Tax Credit Program (LIHTC)
- Pennsylvania Housing Finance Agency (PFHA)
- HUD Section 202 Housing for the Elderly
- HUD Section 811 Housing for the Disabled
- HUD Public and Indian Housing
- Pennsylvania Department of Community and Economic Development (DCED)
- Federal Home Loan Bank (FHLB)
- Financial Institutions – Several local financial institutions have developed flexible underwriting criteria to encourage homeownership

6. Public Housing, HUD Assisted Housing, and Low Income Housing Tax Credits

The City of Allentown has a variety of affordable housing options, including public housing managed by the Allentown Housing Authority. There are also several privately managed HUD-assisted developments throughout the City. These affordable housing developments and Housing Choice Vouchers are located across the City in areas of varying income, demographics, and housing tenure.

Housing Choice Voucher usage, Public Housing developments, and Low Income Housing Tax Credit (LIHTC) developments are distributed throughout the City. There are no distinct patterns of concentration of HUD assisted housing units. The City, as well as the Housing Authority, is aware of the concerns of concentrating low-income housing units within close proximity of each other. Both entities encourage new affordable housing developments outside of areas of existing HUD assisted housing but are also providing financial investments into the existing HUD assisted affordable housing units.

The Allentown Housing Authority receives funding through the HUD Office of Public and Indian Housing for the following housing:

Housing for the Senior Citizens and Persons with Disabilities - The John T. Gross Towers and Towers East buildings on W. Allen Street between 13th and 14th streets are designated for residents age 62 or older or disabled individuals of any age (federal law designates physically disabled as "elderly" for the purposes of placing applicants in public housing). In addition, the 700 Building at Seventh and Union streets, Walnut Manor at 15th and Walnut Streets and Central Park on Wahneta near Hanover Avenue are also available for senior citizens and the disabled.

Family Housing - Cumberland Gardens on Cumberland Street in South Allentown and Little Lehigh on Lehigh Street at Martin Luther King Blvd offer 2- to 5-bedroom apartments for families.

The Neighborhood Strategy Area includes 100 housing units distributed throughout the City of Allentown. These properties are available to families and senior citizens. The program includes one-, two- and three-bedroom sites at nine properties, including: 124 N. 4th St.; 343 N. 6th St.; 244 N. 6th St.; 101 N. 7th St.; 301-309 N. 7th St.; 127-129 N. 7th St.; 602-610 Chew St.; 130 Hall St.; and 449 Turner St.

The City of Bethlehem has a variety of affordable housing options, including public housing managed by the Bethlehem Housing Authority. There are also several privately managed HUD-assisted developments throughout the City. These affordable housing developments and Housing Choice Vouchers are located across the City in areas of varying income, demographics, and housing tenure.

Housing Choice Voucher usage, Public Housing developments, and Low Income Housing Tax Credit (LIHTC) developments are distributed throughout the City. There are no distinct patterns of concentration of HUD assisted housing units. The City, as well as the Housing Authority, is aware of the concerns of concentrating low-income housing units within close proximity of each other. Both entities encourage new affordable housing developments outside of areas of existing HUD assisted housing but are also providing financial investments into the existing HUD assisted affordable housing units.

The Bethlehem Housing Authority receives funding through the HUD Office of Public and Indian Housing for the following housing:

AMP #1 – Pembroke, 1429 Fritz Drive, 196 Family and specially designed handicap units, Built 1941, Remodeled 1995; Fairmount Homes, 1429 Fritz

Drive, 120 units including specially designed handicap units, Built 1953, Remodeled 1997; and Pfeifle Homes, 1429 Fritz Drive, 50 units, Built 1962, Renovated in 2005-2007.

AMP #2 – Marvine, 1429 Fritz Drive, 389 units including specially modified handicap units, Built 1953, Remodeled 1985 and currently undergoing renovations.

AMP #3 – Lynfield Homes, 1889 Lynfield Drive, 200 units including special handicap units, Built 1985; and Parkridge, 1926 Brookside Drive, 100 units including special handicap units, Built 1992.

AMP #4 – Litzenger House, 225 E. Fourth Street, 101 units, Built 1967; Bodder, 645 Leibert Street, 65 units, Built 1970; Bartholomew, 512 Elm Street, 65 units, Built 1970; and Monocacy Tower, 645 Main Street, 148 Units Built 1973, Remodeled 1989.

AMP #5 – Bayard Homes, 1429 Fritz Drive, 20 Units, new construction, four designed for special needs.

The City of Easton has a variety of affordable housing options, including public housing managed by the Easton Housing Authority. There are also several privately managed HUD-assisted developments throughout the City. These affordable housing developments and Housing Choice Vouchers are located across the City in areas of varying income, demographics, and housing tenure.

Housing Choice Voucher usage, Public Housing developments, and Low Income Housing Tax Credit (LIHTC) developments are distributed throughout the City. There are no distinct patterns of concentration of HUD assisted housing units. The City, as well as the Housing Authority, is aware of the concerns of concentrating low-income housing units within close proximity of each other. Both entities encourage new affordable housing developments outside of areas of existing HUD assisted housing but are also providing financial investments into the existing HUD assisted affordable housing units.

The Easton Housing Authority receives funding through the HUD Office of Public and Indian Housing for the following housing:

Harlan House Senior Associates, 221 S 4th St, Easton, Pennsylvania

Jefferson St - N Union St, 32 N Union St, Easton, Pennsylvania

Bushkill House, 66 N Locust St, Easton, Pennsylvania

Delaware Terrace, 948 Glendon Ave, Easton, Pennsylvania

Neston Heights, 205 E Kleinhans St, Easton, Pennsylvania

Neston Heights Senior Project, 137 E Kleinhans St, Easton, Pennsylvania

Walter House, 205 Michael Koury Place, Easton, Pennsylvania

St. Joseph Street, 202 E. St. Joseph Street, Easton, Pennsylvania

The Northampton County Housing Authority receives funding through the HUD Office of Public and Indian Housing for the following housing:

Oliver Border House - 75 units, 15 South Wood Street, Nazareth, PA 18064

Howard Jones Manor -31 units, 129 Mill Street, Bath, PA 18014

The Public Housing and Housing Choice Vouchers Waiting Lists are closed for all of the communities. The most immediate needs of the households on the waiting list include: decent, safe, sanitary and affordable housing; supportive services such as employment training; access to transportation for commuting to work, shopping, and medical services; and living wage job opportunities. The waiting lists are disproportionately represented by extremely low- and very low-income households.

Low Income Housing Tax Credit (LIHTC) Housing

The following is a list of Low Income Housing Tax Credit housing in the Cities of Allentown, Bethlehem, and Easton, and Northampton County.

LIHTC PROJECTS IN ALLENTOWN, BETHLEHEM, EASTON, AND COUNTY OF NORTHAMPTON

HUD ID Number	Project Name	Project Address	Project City	Project State	Project ZIP Code	Total Number of Units	Total Low-Income Units
PAA19930005	10TH ST PROJECT	34 N TENTH ST	Allentown	Pennsylvania	18101	23	23
PAA19880070	137 S EIGHTH ST	137 S EIGHTH ST	Allentown	Pennsylvania	18101	3	3
PAA19890205	240 E HAMILTON ST	240 E HAMILTON ST	Allentown	Pennsylvania	18109	2	2
PAA19880190	314 N CHURCH ST	314 N CHURCH ST	Allentown	Pennsylvania	18102	8	7
PAA19880205	327 N LUMBER ST	327 N LUMBER ST	Allentown	Pennsylvania	18102	1	1

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PAA19920050	627 HAMILTON APTS	627 HAMILTON ST	Allentown	Pennsylvania	18101	30	30
PAA19880360	715-723 E HAMILTON ST	715 E HAMILTON ST	Allentown	Pennsylvania	18109	8	8
PAA19880400	833 W PINE ST	833 W PINE ST	Allentown	Pennsylvania	18102	3	3
PAA19890460	846 W WALNUT ST	846 W WALNUT ST	Allentown	Pennsylvania	18102	2	2
PAA19890465	848 W WALNUT ST	848 W WALNUT ST	Allentown	Pennsylvania	18102	2	2
PAA19880420	964 JACKSON ST	964 JACKSON ST	Allentown	Pennsylvania	18102	4	4
PAA00000012	ALLENTOWN NATIONAL BANK	15 N SEVENTH ST	Allentown	Pennsylvania	18101	63	-
PAA19890485	ALLENTOWN TOWNE HOUSE	1827 W WALNUT ST	Allentown	Pennsylvania	18104	160	159
PAA00000032	CEDAR VILLAGE APTS	4234 DORNEY PARK RD	Allentown	Pennsylvania	18104	50	-
PAA19910360	CONSTITUTION DR APTS	1012 CONSTITUTION DR	Allentown	Pennsylvania	18103	3	3
PAA00000043	CUMBERLAND GARDENS	501 E CUMBERLAND ST	Allentown	Pennsylvania	18103	70	-
PAA20142004	CUMBERLAND GARDENS PHASE II	SCATTERED SITES	Allentown	Pennsylvania	18103	70	70
PAA20151002	CUMBERLAND GARDENS PHASE III	SCATTERED SITES	Allentown	Pennsylvania	18103	56	56
PAA19910410	GORDON STREET APTS		Allentown	Pennsylvania	-	20	20
PAA00000093	GREYSTONE APTS	106 S SEVENTH ST	Allentown	Pennsylvania	18101	24	-
PAA00000094	HAMILTON ST (627)	627 HAMILTON ST	Allentown	Pennsylvania	18101	30	-
PAA20080080	HART PHASE 2A	-	Allentown	Pennsylvania	-	60	60
PAA00000098	HART PHASE 2B	N BRADFORD E	Allentown	Pennsylvania	-	50	-
PAA20070070	HART RENTAL PHASE I	E LINDEN ST HANOVER AVE	Allentown	Pennsylvania	-	80	80
PAA20070075	HART RENTAL PHASE II	445 HANOVER AVE	Allentown	Pennsylvania	18109	79	79
PAA19900360	MARKET STREET APTS	345 MARKET ST	Allentown	Pennsylvania	18103	7	7
PAA19990155	MOUNTAINVILLE MANOR	1920 S FIFTH ST	Allentown	Pennsylvania	18103	20	20
PAA19930210	N 5TH ST APTS	950 N FIFTH ST	Allentown	Pennsylvania	18102	8	8
PAA19890305	NORTH HALL ST	422 1/2 N HALL ST	Allentown	Pennsylvania	18102	1	1
PAA19910535	PINE STREET ASSOC	930 W PINE ST	Allentown	Pennsylvania	18102	1	1
PAA19870395	S 7TH ST APTS	1112 S SEVENTH ST	Allentown	Pennsylvania	18103	5	5

BEAN Fair Housing Partnership

PAA19920260	SHERMAN STREET APTS	616 SHERMAN ST	Allentown	Pennsylvania	18109	3	3
PAA00000256	TENTH STREET	3435-37 39-41 N TENTH ST	Allentown	Pennsylvania	18101	23	-
PAA19900420	TURNER ST APTS	146 N SEVENTH ST	Allentown	Pennsylvania	18101	12	12
PAA19880665	UNION STREET APTS	259 E UNION ST	Allentown	Pennsylvania	18109	4	4
PAA19870435	WHITE HALL APTS	927 S SEVENTH ST	Allentown	Pennsylvania	18103	2	2
PAA19910650	WOODWARD STREET	641 S WOODWARD ST	Allentown	Pennsylvania	18103	7	7
PAA19890095	1538 E EIGHTH ST APTS	1538 E EIGHTH ST	Bethlehem	PA	18015	4	4
PAA19870145	43-55 W SPRUCE ST	43 W SPRUCE ST	Bethlehem	PA	18018	7	7
PAA19900140	536-38 BROADWAY ST	536 BRDWAY	Bethlehem	PA	18015	6	6
PAA19890470	941 E FOURTH ST	941 E FOURTH ST	Bethlehem	PA	18015	2	2
PAA19870255	ATLANTIC APTS	729 E SEVENTH ST	Bethlehem	PA	18015	6	6
PAA19910320	ATLANTIC STREET APTS	825 ATLANTIC ST	Bethlehem	PA	18015	22	22
PAA20060015	BETHLEHEM TOWNHOMES II	1191 LIVINGSTON ST	Bethlehem	PA	18017	127	127
PAA20080020	BETHLEHEM YMCA	430 E BRD ST	Bethlehem	PA	18018	35	33
PAA19870275	BROAD & HIGH STREETS	604 HIGH ST	Bethlehem	PA	18018	12	12
PAA19870280	CHEROKEE APTS	501 CHEROKEE ST	Bethlehem	PA	18015	5	5
PAA19910385	E FOURTH ST APTS	1136 E FOURTH ST	Bethlehem	PA	18015	8	8
PAA19970060	EATON AVENUE APTS	1102 EATON AVE	Bethlehem	PA	18018	50	50
PAA20030065	FORTE APTS	1345 E FIFTH ST	Bethlehem	PA	18015	10	10
PAA20070055	FRED B ROONEY BUILDING	4 E FOURTH ST	Bethlehem	PA	18015	150	150
PAA20030070	GOEPP STREET APTS	735 E GOEPP ST	Bethlehem	PA	18018	54	54
PAA20020065	LEXIES DREAM	1609 SCHOENERSVILLE RD	Bethlehem	PA	18018	15	15
PAA19990153	MORAVIAN HOUSE III	133 W UNION BLVD	Bethlehem	PA	18018	50	50
PAA20020110	PARKVIEW AT BETHLEHEM	1241 CLUB AVE	Bethlehem	PA	18018	115	115
PAA19930235	PENNSYLVANIA AVE APTS	1442 PENNSYLVANIA AVE	Bethlehem	PA	18018	14	14
PAA20020125	SCHOENERSVILLE APTS	1547 SCHOENERSVILLE RD	Bethlehem	PA	18018	40	40
PAA20142019	SOUTH SIDE LOFTS	419-429 HAYES ST	BETHLEHEM	PA	18015-1907	46	46

BEAN Fair Housing Partnership

PAA20130016	VHDC AP54	SCATTERED SITES	BETHLEHEM	PA	18015-0000	51	51
PAA19870415	W UNION BLVD	42 W UNION BLVD	Bethlehem	PA	18018	10	10
PAA19930060	BISHOP APTS	527 NAMPTON ST	Easton	PA	18042	20	20
PAA19960035	BUTLER STREET APTS	1198 BUTLER ST	Easton	PA	18042	9	9
PAA00000028	CANAL PARK APTS	602 CANAL PARK	Easton	PA	18042	27	-
PAA00000052	DELAWARE TERRACE SENIOR	-	Easton	PA	18042	40	-
PAA00000053	DELAWARE TERRACE-FAMILY RENTAL	210 JONES HOUSTON WAY	Easton	PA	18042	56	-
PAA19900255	FERRY STREET APTS	600 FERRY ST	Easton	PA	18042	10	10
PAA19990095	GRANDVIEW APTS	100 GRANDVIEW DR	Easton	PA	18045	57	57
PAA19990097	GRANDVIEW II	200 GRANDVIEW DR	Easton	PA	18045	60	60
PAA20020050	HARLAN HOUSE ELDERLY HOUSING	221 S FOURTH ST	Easton	PA	18042	100	100
PAA20010095	KNOX AVENUE SENIOR APTS	1101 KNOX AVE	Easton	PA	18040	48	48
PAA19930285	S THIRD ST APTS	100 S THIRD ST	Easton	PA	18042	22	22
PAA00000241	SOUTH THIRD STREET APTS	104 S THIRD ST	Easton	PA	18042	22	-
PAA20040170	WILSON MANOR APTS	535 AVONA AVE	Easton	PA	18042	60	60

Source: <https://lihtc.huduser.gov/>

There are seventy-three (73) LIHTC projects with 1,905 units of affordable rental housing in the County; thirty-seven (37) in Allentown; twenty-three (23) in Bethlehem, and thirteen (13) in Easton.

Multifamily Housing

The following is a list of HUD Multifamily housing in the Cities of Allentown, Bethlehem, and Easton, and Northampton County.

HUD ID	PROPERTY NAME	ADDRESS	CITY	STATE	ZIP	TOTAL ASSISTED UNITS	TOTAL UNITS	ASSISTANCE
800215959	PARK VIEW AT BETHLEHEM	1241 Club Ave	Bethlehem	PA	18018	0	115	Insured-Unsubsidized
800234267	FCD-Saber-Slate Belt	701 Slate Belt Boulevard	Bangor	PA	18013	0	0	Insured-Unsubsidized

BEAN Fair Housing Partnership

800236815	Saucon Valley Manor Senior Living	1050 Main Street	Hellertown	PA	18055	0	169	Insured- Unsubsidized
800239511	Country Meadows of Bethlehem	4035 Green Pond Road	Bethlehem	PA	18020	0	297	Insured- Unsubsidized
800245614	New Eastwood Healthcare & Rehabilitation	2125 Fairview Avenue	Easton	PA	18042	0	97	Insured- Unsubsidized
800247546	The Gardens at Easton	498 Washington Street	Easton	PA	18042	0	0	Insured- Unsubsidized
800247547	The Gardens for Memory Care at Easton	500 Washington Street	Easton	PA	18042	0	0	Insured- Unsubsidized
800003814	B'NAI B'RITH HOUSE	1616 LIBERTY ST	ALLENTOWN	PA	18102	270	271	Insured- Subsidized
800018181	ALLENTOWN HOUSE	1827 WALNUT STREET	ALLENTOWN	PA	18104	159	159	Subsidized, No HUD Financing
800018182	ALLENTOWN NSA	1339 Allen Street	ALLENTOWN	PA	18102	99	99	Subsidized, No HUD Financing
800018191	ANTONIAN TOWERS	2405 Hillside AVE	EASTON	PA	18042	50	50	Insured- Subsidized
800018209	BANGOR ELDERLY HOUSING	101 MURRAY ST	BANGOR	PA	18013	100	100	Subsidized, No HUD Financing
800018238	BETHLEHEM TOWNHOUSE II	1191 LIVINGSTON ST	BETHLEHEM	PA	18017	113	127	Insured- Subsidized
800018239	BETHLEHEM TOWNHOUSES I	1059 C LIVINGSTON ST	BETHLEHEM	PA	18017	73	109	Subsidized - Previously Insured
800018384	EASTON SENIOR CITIZEN HSG	127 S 4TH ST	EASTON	PA	18042	97	97	Subsidized, No HUD Financing
800018404	EPISCOPAL APTS OF THE SLATE BELT	684 AMERICAN BANGOR RD	BANGOR	PA	18013	93	94	Insured- Subsidized
800018405	EPISCOPAL HOUSE	1440 WALNUT ST	ALLENTOWN	PA	18102	15	210	Subsidized - Previously 202/811

BEAN Fair Housing Partnership

800018529	HOLY FAMILY APARTMENTS	334 13TH AVENUE	BETHLEHEM	PA	18018	50	50	Insured-Subsidized
800018615	LITTLE LEHIGH MANOR	824 JACKSON STREET	ALLENTOWN	PA	18102	110	111	Subsidized, No HUD Financing
800018626	LUTHERAN MANOR	2085 WESTGATE DR	BETHLEHEM	PA	18018	195	196	Subsidized - Previously Insured
800018681	MORAVIAN HOUSE I	737 MAIN ST	BETHLEHEM	PA	18018	100	162	Subsidized - Previously Insured
800018682	MORAVIAN HOUSE II	701 MAIN ST	BETHLEHEM	PA	18018	106	106	Subsidized - Previously 202/811
800018741	SOUTH SIXTH STREET	129 SOUTH SIXTH STREET	ALLENTOWN	PA	18101	49	49	Subsidized, No HUD Financing
800018781	PHOEBE APTS	1901 S LINDEN ST	ALLENTOWN	PA	18104	26	132	202/811
800018841	SAUCON MANOR	650 Northampton ST	HELLERTOWN	PA	18055	50	51	Subsidized - Previously Insured
800018842	SCATTERED SITES	1339 ALLEN STREET	ALLENTOWN	PA	18102	25	25	Subsidized, No HUD Financing
800018868	SHILOH MANOR	223 BROTHER THOMAS BRIGHT AVE	EASTON	PA	18042	58	58	202/811
800018879	SOUTH SIXTH ST REHAB I	102-124 South Sixth Street	ALLENTOWN	PA	18101	36	36	Subsidized, No HUD Financing
800018881	FRED B ROONEY aka BETHLEHEM DEVELOPERS	4 E FOURTH ST	BETHLEHEM	PA	18015	150	150	Insured-Subsidized
800018882	SPITALE ELDERLY APTS.	607 NORTHAMPTON ST	EASTON	PA	18042	12	12	Subsidized, No HUD Financing
800018910	STEP-BY-STEP	11 WEST 4th ST	BETHLEHEM	PA	18015	5	5	202/811
800018935	HAMPTON HOUSE	1802 LINCOLN AVE	NORTHAMPTON	PA	18067	100	101	Insured-Subsidized

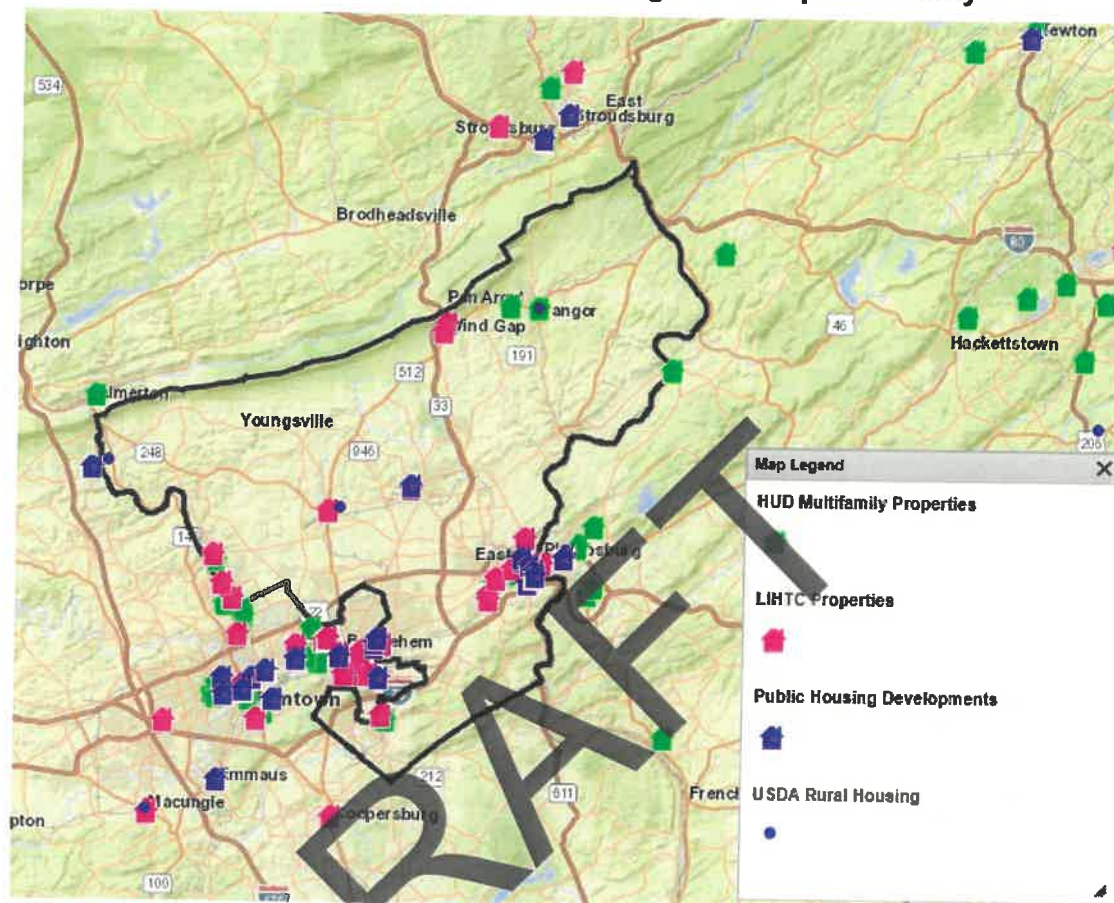
800019015	WEST THIRD STREET APTS.	14 -16-18 W THIRD ST	BETHLEHEM	PA	18015	8	8	Subsidized, No HUD Financing
800019040	WOODLAND MANOR	1918 GATEWOOD LN	BETHLEHEM	PA	18018	70	70	Subsidized, No HUD Financing
800212955	AHEPA LEHIGH CHAPTER 60 APTS.	1823-1849 Chapel Avenue	ALLENTOWN	PA	18103	48	48	202/811
800213044	ALLENTOWN, PENNSYLVANIA SUPPOR	903-917 & 919-935 So. 5th Street	ALLENTOWN	PA	18103	18	18	202/811
800217852	LIVINGSTON MANOR	1054 Livingston St	Bethlehem	PA	18017	42	42	202/811
800221320	MORAVIAN HOUSE IV	70 W North St	Bethlehem	PA	18018	8	8	202/811
800244571	OVERLOOK 1A	445 Hanover Ave Ste 105	Allentown	PA	18109	80	80	Subsidized, No HUD Financing
800244572	OVERLOOK 2A	445 Hanover Ave Ste 105	Allentown	PA	18109	60	60	Subsidized, No HUD Financing

Source: https://www.hud.gov/program_offices/housing/mfh/presrv/mfhpreservation

There are forty (40) active HUD Multifamily Housing projects with 3,572 units of affordable rental housing in the area; thirteen (13) in Allentown; fourteen (14) in Bethlehem, and seven (7) in Easton.

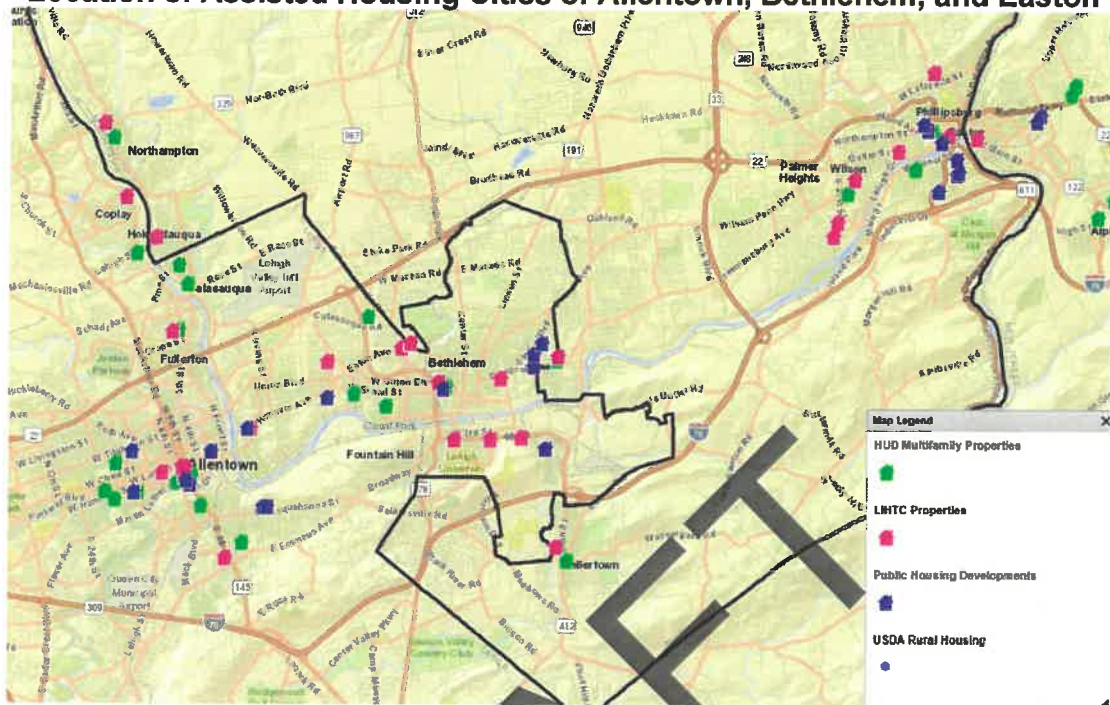
Housing Choice Voucher usage, Public Housing developments, and Low Income Housing Tax Credit (LIHTC) developments are distributed throughout the area but mainly concentrated in the urban areas. The communities, as well as the Housing Authorities, are aware of the concerns of concentrating low-income housing units within close proximity of each other. Both entities encourage new affordable housing developments outside of areas of existing HUD assisted housing but are also providing financial investments into the existing HUD assisted affordable housing units. The partnership should look for a regional approach to developing future affordable housing, as well as deconcentrating existing lower-income housing throughout the area to encourage fair housing choice.

Location of Assisted Housing Northampton County



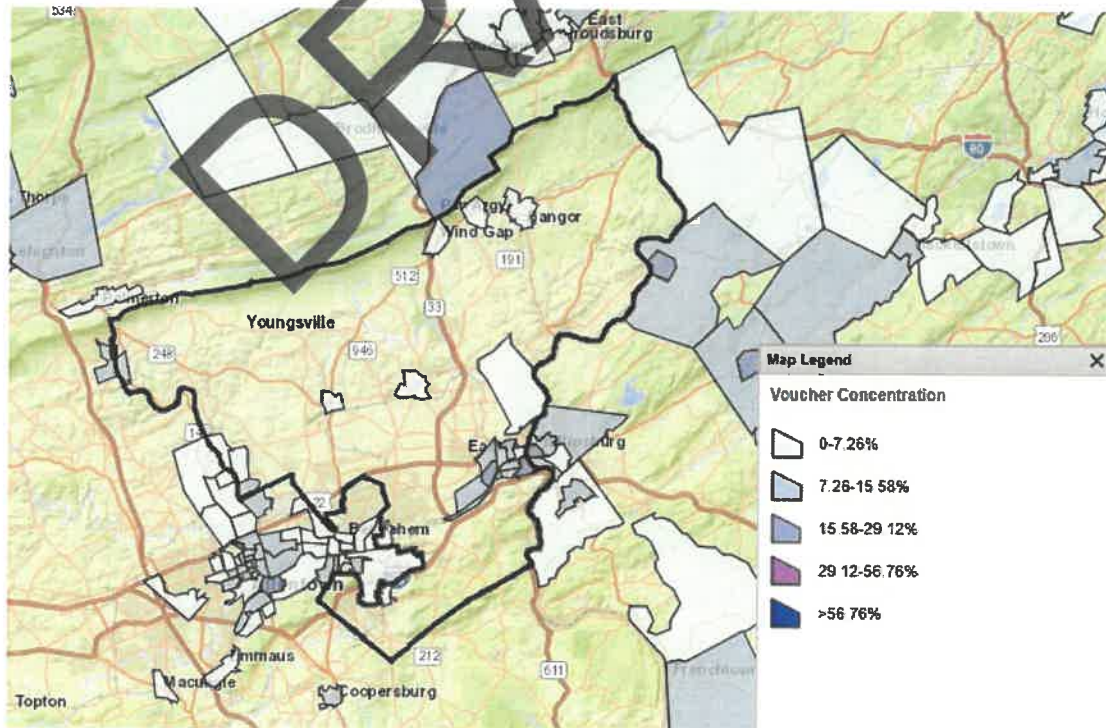
Source: HUD CPD Maps

Location of Assisted Housing Cities of Allentown, Bethlehem, and Easton



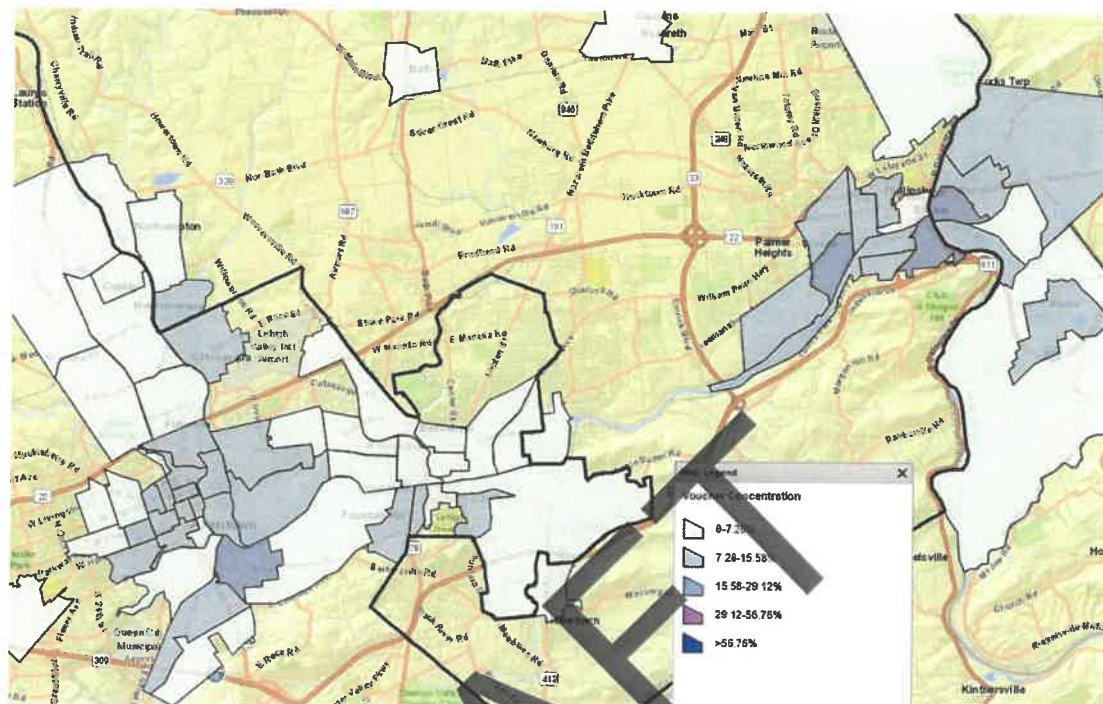
Source: HUD CPD Maps

Voucher Concentration Northampton County



Source: HUD CPD Maps

Voucher Concentration Cities of Allentown, Bethlehem, and Easton



Source: HUD CPD Maps

7. Planning, Zoning, and Building Codes

Zoning Ordinances can be overtly discriminatory by limiting development or occupancy of housing based on a resident's race, sex, religion, national origin, color, disability, or familial status. Additionally, discrimination, albeit unintentional, can occur when a facially neutral ordinance has a disparate impact on a protected class. An example of this has been litigated over limitations in the definition of a family as 4 or fewer unrelated adults. A ceiling of four or fewer unrelated individuals in a household may be considered discriminatory if it can be proven that this limitation disproportionately affects minorities, large families with children, or individuals with disabilities. The Federal Courts have ruled that four to six persons with a disability living together in a single-family residence, should be considered a "family" and thereby be permitted to live together as a family in any zoning district that permits residential uses. The Fair Housing Act also makes it unlawful to refuse to make reasonable accommodations, or changes to rules, policies practices, or services, when such accommodations are necessary to allow a person with a disability an equal opportunity to use or enjoy a dwelling. Under the Fair Housing Act, an accommodation is considered reasonable if it does not impose an undue financial or administrative burden and it does not fundamentally alter the zoning ordinance.

The Lehigh Valley Planning Commission (LVPC) was formed to create a comprehensive plan to guide orderly growth in Lehigh and Northampton counties. The LVPC offers community planning services to the Lehigh Valley's 62 municipalities such as drafting zoning, subdivision and land development ordinances. The LVPC has model zoning ordinances and is available for technical assistance to assist communities take actions to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment.

In addition to zoning ordinance update, it is recommended that the communities adopt a commitment to affirmatively further fair housing through its land use regulations and public policies, such as zoning, to promote fair housing choice for all residents in the Lehigh Valley. The statement should include mention of the Fair Housing Act of 1968, the Americans with Disabilities Act of 1990, as well as identification of the federal protected classes.

All of the communities should consider adopting a written reasonable accommodation policy that allows for changes in rules and procedures to afford persons with disabilities equal opportunity to housing, as required by the Fair Housing Act. A reasonable accommodation policy would allow the municipality flexibility in the application of zoning and land use, as well as providing housing developers guidance in requesting reasonable accommodations.

Commonwealth of Pennsylvania Building Codes

The UCC Administration and Enforcement regulation has adopted the following codes for use throughout the Commonwealth of Pennsylvania, effective 10/1/2018:

- International Building Code 2015 (code for all buildings and structures not regulated by the International Residential Code 2015:
 - Chapter 1 is not adopted (most of its requirements are incorporated in Chapter 403 of the UCC regulation)
 - Chapter 27 (Electrical) requires that all electrical components, equipment and systems in buildings and structures covered by the IBC comply with the requirements of NFPA 70-2014, National Electric Code.
- Chapter 11, International Building Code 2018 Accessibility Requirements

- International Energy Conservation Code 2015
- International Existing Building Code 2015
- International Fire Code 2015
 - Adopted only to the extent referenced in Chapter 35 of the International Building Code 2015.
- International Fuel Gas Code 2015
 - Any LPG requirements are superseded by the requirements of Pennsylvania's Propane and Liquefied Petroleum Gas Act (and regulations)
- International Mechanical Code 2015
- International Performance Code for Buildings and Facilities 2009 (provides alternative compliance approach)
- International Plumbing Code 2015
- International Residential Code 2015 (code for one- and two-family dwellings no more than 3 stories in height)
- International Wildland-Urban Interface Code 2015 (supplementary requirements that may be used to mitigate fire- and life-safety hazards in unique wildland areas)

The International Building Code (new construction) and the International Existing Building Code (renovation/rehabilitation) are model codes and are in compliance with the federal laws and regulations governing fair housing and accessibility.

Building inspections are administered by the local municipalities. The Building Codes are enforced through plan review and inspections. Interviews with inspection staff indicated that developers and contractors are abiding by the state and federal accessibility regulations and there does not appear to be any blatant violations.

Accessibility Regulations

HUD encourages its grantees to incorporate "visitability" principles into their designs. Housing that is "visitable" includes the most basic level of

accessibility that enables persons with disabilities to visit the home of a friend, family member, or neighbor. "Visitable" homes have at least one accessible means of egress/ingress for each unit, and all interior and bathroom doorways have at least a 32-inch clear opening. As a minimum, HUD grantees are required to abide by all federal laws governing accessibility for disabled persons. The entitlement communities appear to be in full compliance with the HUD visitability standards.

Federal laws governing accessibility requirements include Section 504 of the Rehabilitation Act, the Americans with Disabilities Act, and the Fair Housing Act.

Section 504 of the Rehabilitation Act (24 CFR Part 8), known as "Section 504" prohibits discrimination against persons with disabilities in any program receiving Federal funds. Specifically, Section 504 concerns the design and construction of housing to ensure that a portion of all housing developed with federal funds is accessible to those with mobility, visual, and hearing impairments.

The Americans with Disabilities Act (42 U.S.C. 12131; 47 U.S.C. 155, 201, 218, and 225) (ADA) prohibits discrimination against persons with disabilities in all programs and activities sponsored by state and local governments. Specifically, ADA gives HUD jurisdiction over housing discrimination against persons with disabilities.

The Fair Housing Act prohibits discrimination in the sale or rental of housing. It also requires that landlords must make reasonable modifications dwellings and common use areas to accommodate persons who have a disability. For all new residential buildings of four or more units built after March 13, 1991: public and common areas must be accessible to persons with disabilities; doors and hallways must be wide enough for wheelchairs; all housing units must have accessible routes into and through the unit; there must be accessible light switches, outlets, thermostats; bathroom walls must be reinforced to allow for the installation of grab bars; and kitchens and baths must be accessible so they can be used by persons in wheelchairs.

8. Limited English Proficiency (LEP) Persons

Section 601 of Title VI the Civil Rights Act of 1964 is the federal law that protects individuals from discrimination on the basis of their race, color, or national origin in programs or activities that receive federal financial assistance. One type of national origin discrimination is based on a person's inability to speak, read, write, or understand English. In certain situations, failure to ensure that persons who are LEP can effectively participate in, or benefit from, federally assisted programs may violate the Civil Rights Act.

According to the 2013-2017 American Community Survey for the City of Allentown, 45.3% of (or 50,264) residents speak a language other than English at home. Also, 19.4% of (or 21,483) residents report that they speak English less than "very well." The following languages are spoken at home:

English	54.7%
Spanish	39.1%
Other Indo-European languages	2.0%
Asian and Pacific Island languages	1.1%
Other languages	3.1%

The two largest non-English speaking populations in the City are Spanish and Other Languages speakers.

According to the 2013-2017 American Community Survey for the City of Bethlehem, 25.5% of (or 18,042) residents speak a language other than English at home. Also, 9.4% of (or 6,693) residents report that they speak English less than "very well." The following languages are spoken at home:

English	74.5%
Spanish	19.4%
Other Indo-European languages	3.3%
Asian and Pacific Island languages	2.0%
Other languages	0.8%

The two largest non-English speaking populations in the City are Spanish and Other Indo-European Languages speakers.

According to the 2013-2017 American Community Survey for the City of Easton, 20.1% of (or 5,168) residents speak a language other than English at home. Also, 8.0% of (or 2,059) residents report that they speak English less than "very well." The following languages are spoken at home:

English	79.9%
Spanish	14.8%
Other Indo-European languages	3.4%
Asian and Pacific Island languages	1.4%
Other languages	0.5%

The two largest non-English speaking populations in the City are Spanish and Other Indo-European Languages speakers.

According to the 2013-2017 American Community Survey for Northampton County, 13.0% of (or 37,308) residents speak a language other than English

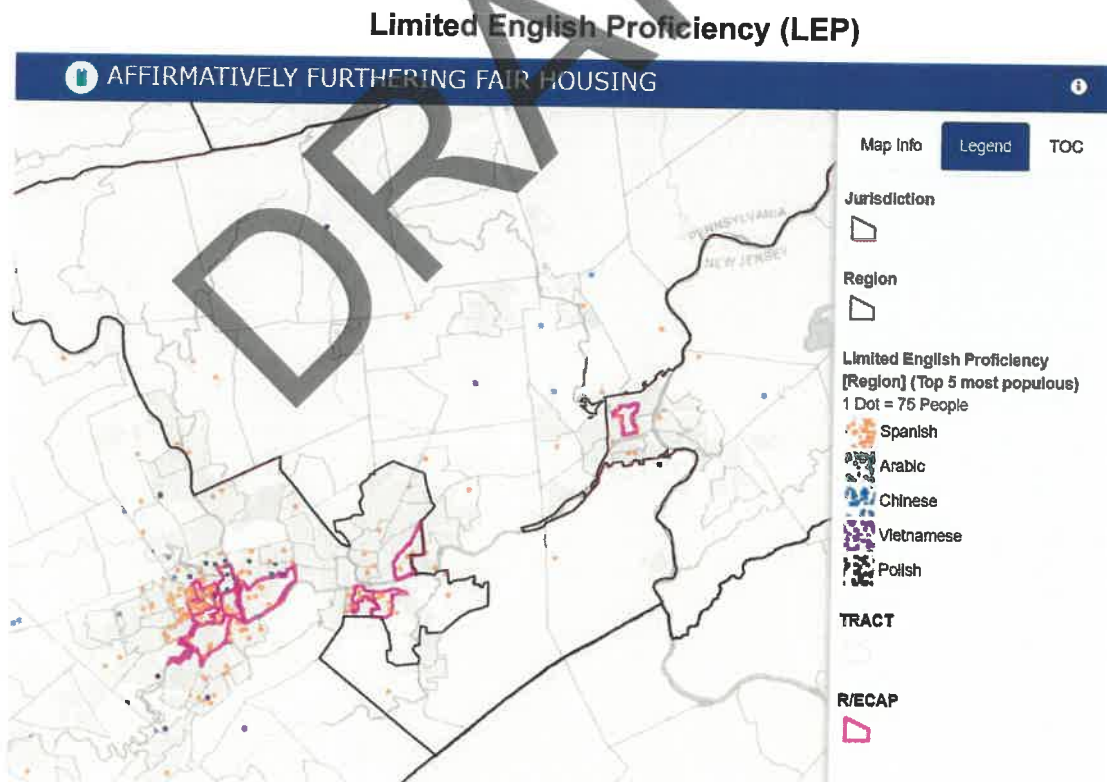
at home. Also, 4.6% of (or 13,212) residents report that they speak English less than “very well.” The following languages are spoken at home:

English	87.0%
Spanish	7.7%
Other Indo-European languages	3.6%
Asian and Pacific Island languages	1.3%
Other languages	0.5%

The two largest non-English speaking populations in the County are Spanish and Other Indo-European Languages speakers.

All of the communities have significant Spanish speaking populations, including limited English proficiency residents. According to federal guidance, written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000 individuals, whichever is less, is required. All of the participant communities should have all vital documents translated to Spanish.

The following map highlights areas of LEP populations.



9. Four Factor Analysis

City of Allentown

The City as a CDBG entitlement community is required to develop a plan for persons of different national origins that cannot speak, read, write, or understand English to ensure that LEP persons have meaningful access to CDBG funded programs and services, as well as all City programs and services. The City has an existing Language Access Plan (LAP) that covers City activities, as well as subrecipient activities. The following Four Factor Analysis was completed by the City in its LAP:

1. Number or Proportion of LEP persons in the population to be served. The 2011-2015 American Community Survey 5-Year Estimates (ACS) state that the population of the City of Allentown is 121,442; five percent of this population is 6,072. Based on the ACS, there is no single language group that meets the five percent requirement. Spanish speakers equal 40% of the population. However, because the City's programs are carried out at the local level by its sub-recipients, the City also analyzed the municipalities individually to assess which languages are present in percentages of five percent or higher in individual communities. It was found that Indo-European is at 1%, Asian/Islander at 3% and other at 3%.

2. Frequency with which LEP persons come into contact with the program activity or service. Because the City funds grantees to carry out programs directly with their communities, the City itself does not have direct contact with residents and LEP persons benefiting from its funding. The City, however, has citizen participation requirements and will make notices, the Consolidated Plan, Annual Action Plans, and other required documents available in Spanish given that the Spanish language group is the largest across the Commonwealth. The City's subrecipients are primarily responsible for the direct relationships with the residents of the City and so this Language Access Plan includes guidelines for sub-recipients and for the City's enforcement of sub-recipient compliance.

3. Importance of the service, information, program, and/or activity. The projects proposed by the City's grantees often offer direct assistance to project area beneficiaries related to housing and other services. Therefore, the City will require that the Four-Factor Analyses completed by its sub-recipients to consider the nature of the activity or service that the sub-recipient plans to undertake. This will ensure that programs that come into contact with limited English proficiency individuals include resources that allow these individuals equal access to services.

4. Resources, financial and human, available to the recipient. Language assistance entails providing both written translations and oral

interpretations as determined by the Four-Factor Analysis. When it is determined that language access is required, specific steps need to be outlined to demonstrate that the access is indeed being provided. The City's plan for itself, and its expectation of its subrecipients, is that every significant touchpoint with LEPs will have options for translation and interpretation services as required by the guidelines. The City already ensures that all vital documents are translated into Spanish to assist the residents of the City who may have limited English proficiency. These documents are placed on the City's website at <http://the City.pa.gov/library/Documentos en Español>. The City website also can translate a document in other languages by opening the document and choosing the flag of the country of the language needed from the top of the webpage. To further aid its sub-recipients in meeting the language access requirements, the City has translated the templates listed in Section VI into the top four languages represented at percentages of five percent or higher across the Commonwealth's municipalities: German/West German (Pennsylvania Dutch), Spanish, Chinese, and Korean. These efforts are designed to ensure that sub-recipients have access to the resources needed for their communities. The City also provides training and technical assistance support to its sub-recipients who have primary contact with the Commonwealth's residents and carry their own responsibilities for ensuring compliance with language access requirements. Additionally, the City has a Language Line Solutions Hotline Number, which is 1-800-523-1786, to provide assistance to LEP persons.

The City as a CDBG entitlement community is required to develop a plan for persons of different national origins that cannot speak, read, write, or understand English to ensure that LEP persons have meaningful access to CDBG funded programs and services, as well as all City programs and services. The City has an existing Language Access Plan (LAP) that covers City activities, as well as subrecipient activities. The following Four Factor Analysis was completed by the City in its LAP:

1. Number or Proportion of LEP persons in the population to be served. Bethlehem obtained information from the U.S. Census Bureau's American Factfinder website as recommended by HUD in order to gather data about the jurisdiction's overall population, as well as the population of LEP persons within the jurisdiction and the primary languages spoken. This data indicated the following:

- Total population 5 years and over is 70,842
- Total LEP population 5 years and over is 6,616
- Spanish speaking LEP population 5 years and over is 5,222
- Other Indo-European language speaking LEP population 5 years and over is 597

- Asian and Pacific Islander language speaking LEP population 5 years and over is 545
- Other language speaking LEP population 5 years and over is 252

The above data demonstrates that less than 15 percent of the jurisdiction's population is considered LEP (9.3%) and that only Spanish meets the 5% or 1,000 person threshold for requiring written translation of vital documents. While the total LEP population for Bethlehem, Pennsylvania is 6,616—the largest LEP population segment, Spanish Speaking, consists of 5,222 persons 5 years of age and older. This demographic background requires written translations and the City of Bethlehem Department of Community and Economic Development does provide vital documents in Spanish and has a bilingual (Spanish) staff member to assist Spanish-speaking clients, prospective clients and members of the general public.

2. Frequency with which LEP persons come into contact with the program activity or service. It has been the experience of Bethlehem's Community and Economic Development staff that Spanish-speaking LEP persons contacting the City for information or assistance was an infrequent occurrence. Nevertheless, the City has bilingual staffing and Spanish-language vital documents.

3. Importance of the service, information, program, and/or activity. The services provided by the City of Bethlehem CDBG and HOME Programs are important as they relate to a client's need for or continued provision of affordable housing and information/referral to other vital services.

4. Resources, financial and human, available to the recipient. Because of the very low frequency of contact from LEP persons seeking assistance from the Department of Community and Economic Development, the additional salary required to add a person with bilingual skills is deemed to be an unnecessary expense at this time. The City believes it is more cost effective to continue to use existing staff for the relatively few cases where language assistance is required.

The City of Bethlehem CDBG and HOME Programs also use appropriate Spanish-language materials provided by HUD, including Fair Housing posters, and other sources.

The CDBG and HOME Programs will seek to retain the services of a professional interpretation service to provide oral interpretation in languages other than Spanish as needed.

Northampton County

The County as a CDBG entitlement community is required to develop a plan for persons of different national origins that cannot speak, read, write, or understand English to ensure that LEP persons have meaningful access to CDBG funded programs and services, as well as all County programs and services. As such, the County has updated its Four Factor Analysis. The purpose of the Four Factor Analysis is to determine the reasonableness of language assistance for LEP persons based on the following:

1. Number or Proportion of LEP persons in the population to be served. It is estimated that the County has one non-English speaking populations that exceed the 5% or 1,000 person LEP limit. That non-English speaking population speaks Spanish. There are additional non-English speakers in the County but in very limited numbers.

2. Frequency with which LEP persons come into contact with the program activity or service. Northampton County's Department of Community and Economic Development uses CDBG funds for activities that directly assist County residents, such as: planning, housing rehabilitation, public facility improvements, and public service activities.

According to the FY 2018 CAPER and Report PR-23, the total beneficiaries of CDBG assistance in PY 2018 were 4,847 individuals; 247 were Black/African American, 4,123 were White, 5 were Asian, 15 were American Indian/Alaskan Native, 457 was Other, Multi-Racial, and 297 were Hispanic.

3. Importance of the service, information, program, and/or activity. The County's CDBG housing and public service activities are critical to the County's residents for access to decent, safe, sanitary, and affordable housing, as well as necessary in terms of supportive services to maintaining residents' quality of life. The County, local advocacy groups and organizations, and its subrecipient agencies must be able to outreach and interact with LEP persons to make CDBG programs and services accessible to LEP persons.

4. Resources, financial and human, available to the recipient. Translation and interpretive services are vital for housing and public services activities and would be provided by the County, either through County staff or a community liaison, to any beneficiary that requires those services. Additionally, CDBG citizen participation materials and public notices will be published with the statement, "Any non-English speaking person wishing to attend the public hearing should contact (Name) at least seven (7) calendar days prior to the meeting and a Spanish interpreter will be provided. This document and program materials are available in Spanish upon request." These statements will be translated in Spanish.

The County does not have a formal written Language Access Plan. Specific to the CDBG Program, its staff and subrecipients, utilize the following language assistance plan to assist LEP persons:

- Engaging advocacy groups to promote services available through the CDBG Program
- Interpretation and translation services by partnering with LEP groups, faith based organizations, and schools
- Referrals to community liaisons proficient in the language of LEP persons
- Notices and training to staff of the availability of LEP services
- Advertising language services in outreach documents
- Utilize HUD translated documents found at:
https://www.hud.gov/program_offices/fair_housing_equal_opp/17lep

10. Taxes

While real estate tax rates may not be an impediment to fair housing choice, the amount and method of calculation of taxes impacts the affordability of housing especially as it relates to housing in the surrounding area.

The following table shows the millage rates for the borough and townships of Northampton County.

Tax Rates in Northampton County for 2018–2019

Place	City	School	County	Total
Bethlehem	0.01822	0.05597	0.0118	0.08599
Easton	0.02495	0.06414	0.0118	0.10089
Allentown City Land	0.02353	0.01972	0.00364	0.05135
Allentown City Building	0.00445	0.01972	0.00364	0.02777
County of Northampton	-	-	0.0118	0.0118

Source: County of Northampton Assessment Division and Office of Assessment Lehigh County

Real estate tax rates are the highest in the Cities as compared to the County. Studies have shown that property values tend to appreciate slower in areas of higher effective property tax rates as compared to areas of lower effective property tax rates. This is of course contingent on the real tax rate as it relates to assessed home values.

11. Comprehensive Plan

The Lehigh Valley Planning Commission (LVPC) in 2019 released the region's fifth comprehensive plan. FutureLV establishes goals, policies and actions designed to carry the region through 2045 and beyond, but it will be updated every four years to account for the changes of a successful and growing region. FutureLV refreshes a 2005 plan that had substantial updates in 2010, and is among the first comprehensive plans in the nation that merges the land use, economic, environmental, housing, preservation and farming policies with the transportation planning and investment policies of the Lehigh Valley Transportation Study. FutureLV covers both Lehigh and Northampton counties, creating a forward-thinking strategy that leads the region into the future, while addressing the needs of today. Source: www.lvpc.org/comprehensive-plan.html

The following goals were identified in the Plans:

Goal #1 – Efficient and Coordinated Development Pattern

A booming economy, beautiful topography and a wide variety of arts and cultural activities define a region that is growing in people, jobs and opportunities. Managing that growth is key as our 62 municipalities strive to build on a regional sense of place that attracts thousands of new residents every year. Directing growth toward a series of Centers and Corridors will help create the dynamic communities of the future, while preserving our natural beauty, history and agricultural land. Working together as a region, we can prepare for a future in which lifestyles, technology and climate are changing dramatically.

Goal #2 – Connected Mixed-Transportation Region

A seamless network where roads, trails, sidewalks and technology connect everyone to every place—that's the goal. For the Lehigh Valley to reach its potential, we must design a transportation system that is welcoming to drivers, walkers and rollers—regardless of age, income or ability—and lay the groundwork for the next generation of technology and communications. Our network of the future will provide transportation and communications options that connect work, home and places where people want to go, both locally and regionally.

Compact walkable, bikeable and safe neighborhoods improve job accessibility and enable people to spend less time in a car. Investing in existing roads, bridges, transit lines and utilities, while using next generation technology to manage freight traffic and enable new job opportunities, will

create a dynamic system that improves the flow of goods, services and people.

Goal #3 – Protected and Vibrant Environment

Lehigh Valley residents have come to consider our urban parks, rolling farmlands and scenic vistas as core to the regional identity. Whether it's enabling people to have active lifestyles, providing food or helping to make the region more resilient against climate change, those assets provide health, economic and environmental benefits that are key to our success.

Protecting our land, water and air preserves our region's character and makes it an attractive place to live, work and visit. Enhancing those assets will improve our quality of life and puts the region on a path to a sustainable future.

Goal #4 – Competitive, Creative and Sustainable Region

Our dynamic economy draws on our location, people and natural assets. Nearly 100,000 people commute to the Lehigh Valley daily for its bustling job market. Another 15 million flock here each year to experience recreation and cultural attractions. To keep the region's advantage in a global economy, we need to leverage our prime location and unique character, diversify the regional economy and train the workforce of tomorrow. A key part of that plan includes supporting agriculture and natural resources as economic assets and giving everyone equal access to attainable housing, jobs and transportation. Cooperation among local governments and institutions will be essential to reaching these targets and preparing the region for the challenges to come.

Goal #5 – Safe, Healthy, Inclusive and Livable Communities

The Lehigh Valley's identity begins and ends with quality of life. It rests in safe, walkable neighborhoods, where housing is attainable and public space is designed for everyone. We'll get there through targeted investments, innovative community design and the integration of housing, jobs and transportation that everyone can use. The American Dream is here for the taking.

The Comprehensive Plan does not contain any policy that would impede fair housing choice. Goal #5 in particular encourages development that affirmatively furthers fair housing choice. The following objectives were identified that encourage fair housing choice:

- Promote safe and secure community design and emergency management.

- Implement complete street and traffic-calming measures.
 - Reduce bicycle and pedestrian fatalities towards zero.
 - Incorporate resiliency and hazard mitigation into planning and design, including 100- and 500-year floodplains.
 - Educate the public on hazard impacts and mitigation techniques.
 - Enhance planning and emergency response efforts among emergency management personnel.
 - Reduce blight to improve safety and accessibility in communities.
- Increase social and economic access to daily needs for all people.
 - Encourage use of universal design.
 - Promote safe routes to schools and playgrounds.
 - Create public spaces in underserved areas.
 - Support cultural and social programs.
 - Ensure transportation accessibility for all persons.
 - Integrate mixed-transportation into public space design.
 - Improve connections between bus stops and pedestrian and bicycle infrastructure.
 - Improve data accessibility in public spaces.
- Create community spaces that promote physical and mental health.
 - Promote revitalization of walkable historic centers.
 - Improve walkability of post-war centers.
 - Ensure equitable access to fresh food and produce.
 - Support urban farming and community gardens.
 - Improve access to green spaces.
 - Promote street trees and pedestrian-scale lighting.
 - Strengthen sidewalk, bike route and trail infrastructure.
 - Diversify park programming.
- Promote development that complements the unique history, environment, culture and needs of the Valley.
 - Promote context-specific design solutions.
 - Encourage reuse of vacant and underutilized properties.
 - Promote adaptive reuse of historic buildings.
 - Strengthen historic main streets and cultural centers.
 - Create public spaces that reflect and enhance local culture.
 - Integrate visual and performing art into public space.
 - Support community arts.

12. Section 3

HUD's definition of Section 3 is:

Section 3 is a provision of the Housing and Urban Development Act of 1968. The purpose of Section 3 to ensure that employment and other economic opportunities generated by certain HUD financial assistance shall, to the greatest extent feasible, and consistent with existing Federal, State and local laws and regulations, be directed to low- and very low income persons, particularly those who are recipients of government assistance for housing, and to business concerns which provide economic opportunities to low- and very low-income persons.

All Section 3 covered contracts for the Cities of Allentown, Bethlehem, Easton, and Northampton County include the following clause (referred to as the Section 3 clause):

A. The work to be performed under this contract is subject to the requirements of Section 3 of the Housing and Urban Development Act of 1968, as amended, 12 U.S.C. 1701u (Section 3). The purpose of Section 3 is to ensure that employment and other economic opportunities generated by HUD assistance or HUD-assisted projects covered by Section 3, shall, to the greatest extent feasible, be directed to low- and very low-income persons, particularly persons who are recipients of HUD assistance for housing.

B. The parties to this contract agree to comply with HUD's regulations in 24 CFR part 135, which implement Section 3. As evidenced by their execution of this contract, the parties to this contract certify that they are under no contractual or other impediment that would prevent them from complying with the part 135 regulations.

C. The contractor agrees to send to each labor organization or representative of workers with which the contractor has a collective bargaining agreement or other understanding, if any, a notice advising the labor organization or workers' representative of the contractor's commitments under this Section 3 clause, and will post copies of the notice in conspicuous places at the work site where both employees and applicants for training and employment positions can see the notice. The notice shall describe the Section 3 preference, shall set forth minimum number and job titles subject to hire, availability of apprenticeship and training positions, the qualifications for each; and the name and location of the person(s) taking applications for each of the positions; and the anticipated date the work shall begin.

D. The contractor agrees to include this Section 3 clause in every subcontract subject to compliance with regulations in 24 CFR part 135, and agrees to take appropriate action, as provided in an applicable provision of the subcontract or in this Section 3 clause, upon a finding that the subcontractor is in violation of the regulations in 24 CFR part 135. The

contractor will not subcontract with any subcontractor where the contractor has notice or knowledge that the subcontractor has been found in violation of the regulations in 24 CFR part 135.

E. The contractor will certify that any vacant employment positions, including training positions, that are filled (1) after the contractor is selected but before the contract is executed, and (2) with persons other than those to whom the regulations of 24 CFR part 135 require employment opportunities to be directed, were not filled to circumvent the contractor's obligations under 24 CFR part 135.

F. Noncompliance with HUD's regulations in 24 CFR part 135 may result in sanctions, termination of this contract for default, and debarment or suspension from future HUD assisted contracts.

G. With respect to work performed in connection with Section 3 covered Indian housing assistance, Section 7(b) of the Indian Self-Determination and Education Assistance Act (25 U.S.C. 450e) also applies to the work to be performed under this contract. Section 7(b) requires that to the greatest extent feasible (i) preference and opportunities for training and employment shall be given to Indians, and (ii) preference in the award of contracts and subcontracts shall be given to Indian organizations and Indian-owned Economic Enterprises. Parties to this contract that are subject to the provisions of Section 3 and Section 7(b) agree to comply with Section 3 to the maximum extent feasible, but not in derogation of compliance with Section 7(b).

The City of Allentown has the following Section 3 Goals: 5% participation. Additionally, the City of Allentown has a "Minority and Women's Enterprise Plan" that requires all responses to RFPs to include the following, "The bidders/offers must submit documentary evidence of minority and women business enterprises who have been contacted and to whom commitments have been made. Documentation of such solicitations and commitments shall be submitted concurrently with the bid." The minimum participation level for MBEs is 5% and for WBEs 3%.

The City of Bethlehem does not have any Section 3 Goals.

Northampton County does not have any Section 3 Goals.

All CDBG-funded construction contracts that are subject to Section 3 will include the following documents in the attachments to the bid package –

- CDBG Entitlement Program – Special Conditions (for applicable Program Year funding)
- Federal Labor Standards Provisions – HUD-4010

- Supplementary Conditions of the Contract for Construction – HUD-2554
- Copy of Wage Decision for the Project – General Decision Number – Publication Date
- §135.38 Section 3 Clause
- Employee Rights Under the Davis-Bacon Act – English & Spanish Versions (posters to be displayed at the job site)
- Payroll Reporting Form WH347 (with instructions)
- Record of Employee Interview – HUD-11
- Record of Employee Interview – HUD-11 (in Spanish, including instructions)
- Certified Payroll Form – Signature Authorization form
- Certificate of Compliance – Section 3
- Contractor's/Subcontractor's Statement of Workforce Needs
- Contractor's/Subcontractor's Estimated Project Workforce Breakdown

During this Analysis of Impediments study, no impediments or complaints were mentioned or filed based on Section 3 Requirements.

13. Transportation

Renting or owning an affordable home is not the only factor in a resident's quality of life and access to fair housing. Having access to transportation, whether it is a private vehicle or a public bus, is just as important as the price of a rent or mortgage. Mobility determines whether a resident can access work, education, services, or healthcare.

Lehigh and Northampton County Transit Authority (LANta)

The local bus and paratransit system within the Lehigh Valley is colloquially known as LANta. LANta operates 36 unique bus routes, with seven (7) "Flex" routes, using a fleet of 84 buses. LANta's paratransit service, known as LANtaVan, uses a fleet of 85 vehicles. The bus routes typically run as early as 5 AM to as late as midnight. People with disabilities and elderly residents may call LANtaVan for door-to-door service, though they do not offer same-day service. Residents that wish to use LANtaVan must call, at the latest, by 4:30 PM the day before their desired scheduled ride; conversely, residents cannot call more than fourteen (14) days prior to their desired appointment.

LANta updates its routes at least three (3) times per year, and works closely with the Lehigh Valley Planning Commission and with the individual municipalities within the County. The majority of routes run through the

Cities of Allentown, Bethlehem, and Easton, though there is service to the suburban and rural areas of Northampton County and the greater Lehigh Valley. The following table is LANta's classification system for buses.

Classification	Route Series Designation	Target Areas
Trunk Routes	100's	Regional core corridors with highest levels of population and employment density.
Urban Routes	200's	Urban core corridors with secondary levels of population and employment density.
Commuter Routes	300's	Suburban communities with large numbers of workers commuting to a CBD or suburban employment centers with large numbers of workers commuting from central city areas.
Capacity Enhancing Specials	400's	Areas of high demand from high school and middle school students.
Flex Routes	500's	Suburban areas with isolated population or employment centers.
Special Market Routes	600's	Areas with market specific transportation needs.
Enhanced Bus	1's	Areas along trunk corridors exhibiting demand warranting additional service and capital improvements.

Source: Transit Supportive Land Use for the Lehigh Valley

LANta adopted a study for a Bus Rapid Transit (BRT) system in 2014. The study explored the demand and potential for BRT service along conceptualized corridors. LANta worked with the public through a number of outlets, including advisory committee meetings, board workshops, open houses, and stakeholder meetings to select the corridors and contribute to the plan's goals and objectives. LANta continuously uses elements of the plan as they become affordable, but to date, the BRT has not received any funding.

LANta planners regularly seek out new developments within the Lehigh Valley, with the goal of addressing quality of life infrastructure for transit users before new developments break ground. LANta's Transit Supportive Land Use policies encourage developers to add transit supportive infrastructure if they wish to be considered for bus services. The following are examples of the requirements for a comprehensive pedestrian network associated with public transit, as well as examples of appropriate site planning:

- Sidewalks on both sides of all streets and throughout commercial developments;
- Marked crosswalks at intersections;

- Pedestrian islands, or “refuges” for crossing wide streets; and
- Pedestrian only phases in traffic signals where pedestrian traffic is heavy.
- Minimized walking distances from the street to the main destinations of the development.

Lehigh Valley Planning Commission’s Lehigh Valley Transportation Study (LVTS)

The Lehigh Valley Transportation Study (LVTS) services both Northampton County and Lehigh County within the Lehigh Valley, and is the Metropolitan Planning Organization (MPO) for the region. LVTS conducts regular committee meetings for its two committees, the Technical Committee and the Coordinating Committee. The Coordinating Committee sets policies after reviewing the Technical Committee’s findings.

Lehigh Valley Planning Commission’s MoveLV Long-Term Transportation Plan

The MoveLV Plan considers transportation planning beyond just a level of service (LOS) for a given area. In its Project Evaluation section, MoveLV lists the following criteria for planning documents and data metrics:

- Mobility
- Public/Private Partnerships
- Municipal Considerations
- Consistency with Regional Comprehensive Plan
- Air Quality
- Environmental Justice
- Transportation Alternatives
- Data Inputs

The Plan’s emphasis on quality of life criteria seeks to address issues faced by the most vulnerable populations within Northampton County and the Lehigh Valley. LVPC regularly met with stakeholders and community representatives in order to define the list. The defined list helps LVPC monitor the progress and adjust accordingly as new information comes in. Public participation, according to the Long Range Plan, is mandated by Federal Transportation Legislation, the Civil Rights Act, the Americans with Disabilities Act, and Environmental Justice considerations. LVPC publicized meetings in a timely manner, and meetings were fully accessible to members of the public that required special considerations, such as people with disabilities, or that required translation services.



14. Education

School districts, particularly “good” school districts, is an oft-cited reason for families to move into an area. There are ten (10) public school districts within Northampton County, including the Cities of Bethlehem and Easton, hosting approximately sixty-five (65) schools. The City of Allentown, located in Lehigh County, has its own school district with twenty-two (22) schools.

Pennsylvania Department of Education (PDE) used the Pennsylvania School Performance Profile (SPP) to assess a school’s performance until 2017. The purpose of the SPP was to provide a “building level academic score”. The categories are defined as <60, 60-69.9, 70-79.9, 80-89.9, 90-99.9 and >100. Both of Allentown’s High Schools had scores below 60.

In the fall of 2018, PDE switched to the Future Ready PA Index, with the intent to move away from standardized testing, and instead “ensure that all Pennsylvanians, whether children or adults, have access to a high quality education system that prepares them for future success.” The Future Ready PA Index tracks enrollment statistics such as students who are economically disadvantaged, learning English as a second language, are homeless, or are in foster care.

The following table highlights the Future Ready PA Index for the participant communities:

> 100	90-100	80-89.9	70-79.9	60-69.9	<60
					

**School Performance 2017
Northampton County, PA**

Jurisdiction	School	Building Level Academic Score	State Rankings
Bethlehem Area SD	Liberty High School	68.2	
Bethlehem Area SD	Freedom High School	73.0	
Easton Area SD	Easton Area High School	76.9	
Allentown City SD	William Allen High School	45.7	
Allentown City SD	Louis E Dieruff High School	47.2	
Bangor Area SD	Bangor Area High School	75.9	
Catasauqua Area SD	Catasauqua Senior High School	63.7	

Nazareth Area SD	Nazareth Area High School	95.3	
Northampton Area SD	Northampton Area High School	85.0	
Northern Lehigh SD	Northern Lehigh Senior High School	79.2	
Pen Argyl Area SD	Pen Argyl Area High School	75.3	
Saucon Valley SD	Saucon Valley Senior High School	90.4	
Wilson Area SD	Wilson Area High School	92.3	

Allentown Area School District

- 16,234 District Enrollment
- 4,043 Charter School Enrollment
- 70.9% Hispanic, 14.5% Black, 9.9% White, 3.1% Two or More Races
- 82.5% Economically Disadvantaged
- Partnering Career and Technical Center - Lehigh Career & Technical Institute - 949 Student Enrollment

Bangor Area School District

- 2,968 District Enrollment
- 80 Charter School Enrollment
- 88.9% White, 5.5% Hispanic, 2.7% Two or More Races, 1.9% Black
- Economically Disadvantaged - 44.1%
- Partnering Career and Technical Center - Career Institute of Technology

Bethlehem Area School District

- 13,636 District Enrollment
- Charter School Enrollment
- 42.6% White, 40.6% Hispanic, 10.8% Black, 3.5% Asian
- 58.5% Economically Disadvantaged
- Partnering Career and Technical Center -

Catasauqua Area School District

- Information not available

Easton Area School District

- 8,583 District Enrollment
- Charter School Enrollment
- 47.9% White, 25.2% Hispanic, 17.4% Black, 5.1% Asian
- 50.1% Economically Disadvantaged
- Partnering Career and Technical Center -

Nazareth Area School District

- 4,724 District Enrollment
- Charter School Enrollment
- 85.1% White, 6.3% Hispanic, 4.1% Asian, 2.6% Two or More Races
- 19.5% Economically Disadvantaged
- Partnering Career and Technical Center -

Northampton Area School District

- 5,568 District Enrollment
- Charter School Enrollment
- 85.3% White, 8.7% Hispanic, 3.3% Black, 1.7% 2 or More Races
- 34.4% Economically Disadvantaged
- Partnering Career and Technical Center -

Northern Lehigh Area School District

- Information not available

Pen Argyl Area School District

- 1,629 District Enrollment
- Charter School Enrollment
- 89.8% White, 4.7% Hispanic, 3.4% Two or More Races, 1.1% Black
- 39.5% Economically Disadvantaged
- Partnering Career and Technical Center -

Saucon Valley Area School District

- 2,160 District Enrollment
- Charter School Enrollment
- 85.2% White, 7.0% Hispanic, 3.0% Asian, 2.9% Two or More Races

- 29.5% Economically Disadvantaged
- Partnering Career and Technical Center -

Wilson Area School District

- 2,249 District Enrollment
- Charter School Enrollment
- 57.8% White, 20.9% Hispanic, 10.3% Black, 8.0% Two or More Races
- 49.4% Economically Disadvantaged
- Partnering Career and Technical Center -

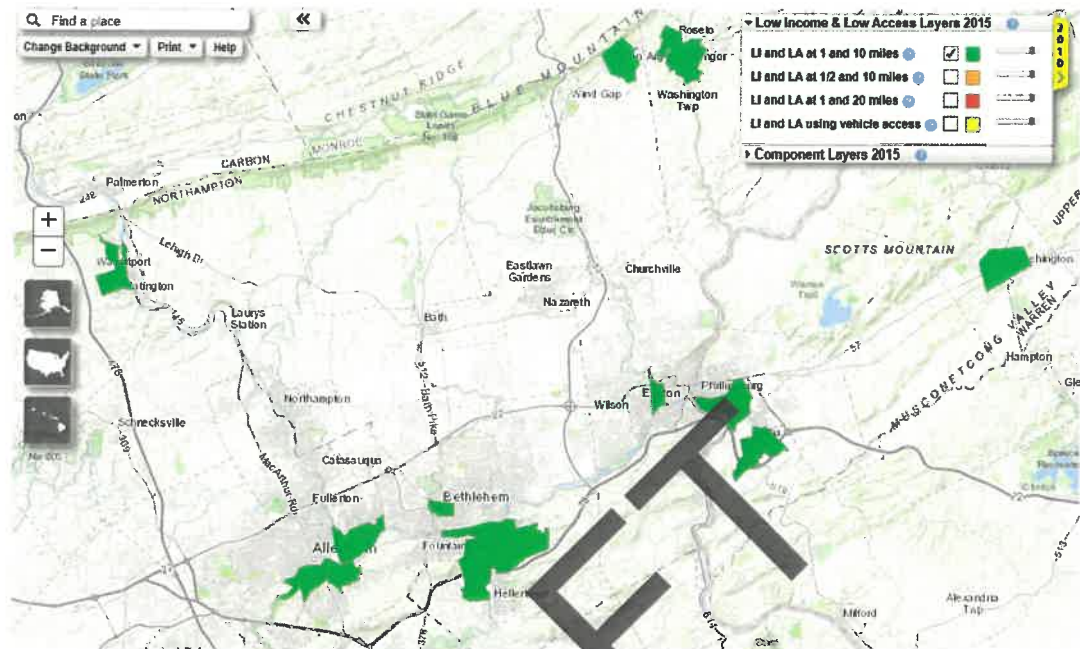
Most of the schools in Northampton County are more than 50% white.

15. Food Access

Limited access to supermarkets, supercenters, grocery stores, or other sources of healthy and affordable food may make it harder for some Americans to eat a healthy diet. There are many ways to measure food store access for individuals and for neighborhoods, and many ways to define which areas are food deserts - neighborhoods that lack healthy food sources. Most measures and definitions take into account at least some of the following indicators of access.

- Accessibility to sources of healthy food, as measured by distance to a store or by the number of stores in an area.
- Individual-level resources that may affect accessibility, such as family income or vehicle availability.
- Neighborhood-level indicators of resources, such as the average income of the neighborhood and the availability of public transportation.

Food Access Map



Source: www.ers.usda.gov/data-products/food-access-research-atlas/go-to-the-atlas

In the map above, low access to healthy food is defined as being far from a supermarket, supercenter, or large grocery store. A census tract is considered to have low access if a significant number or share of individuals in the tract is far from a supermarket. There are three (3) census tracts located in Allentown, two census tracts located in Bethlehem, and one (1) census tract located in Easton that are defined as having low access to healthy food.

C. Private Sector:

The private sector has traditionally generated the most easily recognized impediments to fair housing choice in regard to discrimination in the sale, rental or advertising of dwellings; the provision of brokerage services; or in the availability of financing for real estate purchases. The Fair Housing Act and local laws prohibits such practices as the failure to give the same terms, privileges, or information; charging different fees; steering prospective buyers or renters toward a certain area or neighborhood; or using advertising that discourages prospective buyers or renters because of race, color, religion, sex, handicap, familial status, and national origin.

1. Real Estate Practices

Greater Lehigh Valley Realtors (GLVR) is a trade organization of real estate brokers operating in Lehigh, Northampton, and Carbon Counties. Greater Lehigh Valley Realtors members are bound by the Code of Ethics of the National Association of Realtors (NAR). Under the Code of Ethics, members must maintain professional standards including efforts to affirmatively furthering fair housing. Realtors must complete annual continuing education on topics that focus on protecting the rights of persons covered under the Fair Housing Act, the Civil Rights Act, and ADA laws.

GLVR has a Diversity and Community Involvement Committee, which identifies areas with which GLVR can help its members learn and grow.

GLVR has signed the Greater Lehigh Valley Chamber of Commerce's Diversity and LGBT Business Council's Business Pledge. By signing, GLVR affirms that the association, its members, and its affiliated real estate businesses are friendly with LGBT clients and will uphold and celebrate diversity and inclusiveness. Questions by homebuyers or realtors related to Fair Housing or the Fair Housing Act should be directed to the Government Affairs Director.

2. Real Estate Advertising

Under Federal Law, no advertisement with respect to the sale or rental of a dwelling unit may indicate any preference, limitation, or discrimination because of race, color, religion, sex, handicap, familial status, or national origin. Under the Fair Housing Act Amendments, descriptions are listed in regard to the use of words, photographs, symbols or other approaches that are considered discriminatory.

Real estate advertisements were reviewed from several electronic sources such as: Facebook, Craigslist, Realtor.com, Rent.com, Zillow.com, LehighValleyLive.com and including *The Morning Call*. Some of the sources included a disclaimer from the publisher indicating that each advertisement is subject to the Federal Fair Housing Act and that all dwellings advertised are available on an equal opportunity basis. Most of the sources included the Fair Housing logo. None of the publications appeared to contain discriminatory language nor prohibited occupancy by any protected class.

3. Private Financing

The Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (F.I.R.R.E.A.) requires any commercial institution that makes five (5) or more home mortgage loans, to report all home loan activity to the Federal Reserve Bank under the Home Mortgage Disclosure Act (HMDA). The

annual HMDA data can be found online at www.ffiec.gov/hmda/. The most recent HMDA Data is that of 2017, which is the data that was used for this analysis. The following tables provide an analysis of the HMDA data in the Allentown-Bethlehem-Easton PA-NJ Metropolitan Statistical Area (MSA). The MSA includes the Cities of Allentown, Bethlehem, and Easton. The boundaries between the City and the County are noncontiguous and Census Tracts can include both City and County residents. The home loans included in this report represent loans on 1- to 4-family and manufactured homes from the following loan types: 1) FHA, FSA/RHS and VA; 2) Conventional; 3) Refinancings; and 4) Home Improvement.

DRAFT

The table below lists the lending activity that occurred during 2017 in the area.

Home Loans Purchased by Location of Property and Type of Loan								
Area	FHA, FSA/RHS & VA		Conventional		Refinancing		Home Improvement Loans	
	#	Amount	#	Amount	#	Amount	#	Amount
City of Allentown	531	67,252	570	69,429	413	45,046	105	4,537
City of Bethlehem	299	46,223	484	73,710	335	47,210	71	4,793
City of Easton	107	13,561	134	16,341	78	8,350	28	2,371
Northampton County	1,357	254,967	2,439	486,471	2,141	376,711	551	40,889
MSA	3,691	668,351	6,488	1,269,893	5,468	950,484	1,601	107,653
City of Allentown Loans as a % of MSA Loans	14.39%	10.06%	8.79%	5.47%	7.55%	4.74%	6.56%	4.21%
City of Bethlehem Loans as a % of MSA Loans	8.10%	6.92%	7.46%	5.80%	6.13%	4.97%	4.43%	4.45%
City of Easton Loans as a % of MSA Loans	2.90%	2.03%	2.07%	1.29%	1.43%	0.88%	1.75%	2.20%
Northampton County Loans as a % of MSA Loans	36.77%	38.15%	37.59%	38.31%	39.16%	39.63%	34.42%	37.98%

Source: <https://ffiec.cfbp.gov/data-publication/aggregate-reports/2017/PA/10900>

The table below lists the lending activity that occurred during 2017 in the area.

Home Loans Purchased by Location of Property and Type of Loan						
Loan		Loans Originated	Approved, Not Accepted	Applications Denied	Applications Withdrawn	File Closed for Incompleteness
FHA, FSA/RHS & VA	Allentown	531	9	128	72	15
	Bethlehem	299	7	40	40	10
	Easton	107	7	23	18	3
	Northampton County	1,357	32	186	228	35
	MSA	3,691	81	597	631	105
Conventional	Allentown	570	12	96	74	10
	Bethlehem	484	10	68	84	10
	Easton	134	6	14	19	3
	Northampton County	2,439	61	268	380	56
	MSA	6,488	195	810	978	166
Refinancings	Allentown	413	54	262	220	93
	Bethlehem	335	44	158	150	73
	Easton	78	13	63	50	28
	Northampton County	2,141	270	926	884	407
	MSA	5,468	578	2,442	2,179	1,079
Home Improvement Loans	Allentown	105	6	115	22	10
	Bethlehem	71	2	73	15	5
	Easton	28	3	37	2	1
	Northampton County	551	27	403	81	38
	MSA	1,601	77	1,032	259	100

Source: <https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/PA/10900>

The table below lists the lending activity by income group to establish a baseline for lending activity per income.

Disposition of Loan Applications by Income of Applicant												
Loan	Income	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
FHA, FSA/RHS, and VA	Less than 50% of MSA/MD median	720	486	67.50%	15	2.08%	126	17.50%	77	10.69%	16	2.22%
	50-79% of MSA/MD median	1,635	1,196	73.15%	27	1.65%	185	11.31%	193	11.80%	34	2.08%
	80-99% of MSA/MD median	870	635	72.99%	16	1.84%	83	9.54%	117	13.45%	19	2.18%
	100-119% of MSA/MD median	638	477	74.76%	7	1.10%	50	7.84%	94	14.73%	10	1.57%
	120% or more of MSA/MD median	1,180	885	75.00%	16	1.36%	115	9.75%	139	11.78%	25	2.12%
Conventional	Less than 50% of MSA/MD median	644	422	65.53%	15	2.33%	137	21.27%	58	9.01%	12	1.86%
	50-79% of MSA/MD median	1,599	1,161	72.61%	40	2.50%	194	12.13%	170	10.63%	34	2.13%
	80-99% of MSA/MD median	1,033	752	72.80%	26	2.52%	116	11.23%	118	11.42%	21	2.03%
	100-119% of MSA/MD median	873	666	76.29%	13	1.49%	84	9.62%	97	11.11%	13	1.49%
	120% or more of MSA/MD median	4,200	3,262	77.67%	95	2.26%	246	5.86%	515	12.26%	82	1.95%
Refinance	Less than 50% of MSA/MD median	1,190	974	81.85%	68	5.71%	426	35.80%	234	19.66%	88	7.39%
	50-79% of MSA/MD median	2,098	892	42.52%	95	4.53%	527	25.12%	402	19.16%	182	8.67%
	80-99% of MSA/MD median	1,342	626	46.56%	61	4.55%	288	21.46%	250	18.63%	117	8.72%

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	100-119% of MSA/MD median	1,268	584	46.06%	67	5.28%	279	22.00%	236	18.61%	102	8.04%
	120% or more of MSA/MD median	4,502	2,389	52.62%	233	5.18%	752	16.70%	783	17.39%	365	8.11%
Home Improvement	Less than 50% of MSA/MD median	355	112	31.55%	9	2.54%	201	56.62%	22	6.20%	11	3.10%
	50-79% of MSA/MD median	561	249	44.39%	13	2.32%	225	40.11%	52	9.27%	22	3.92%
	80-99% of MSA/MD median	393	207	52.67%	10	2.54%	134	34.10%	29	7.38%	13	3.315
	100-119% of MSA/MD median	330	176	53.33%	11	3.33%	101	30.61%	34	10.30%	8	2.42%
	120% or more of MSA/MD median	1,334	827	61.99%	33	2.47%	313	23.46%	119	8.92%	42	3.15%
Total	Less than 50% of MSA/MD median	2,909	1,394	47.92%	107	3.68%	890	30.59%	391	13.44%	127	4.37%
	50-79% of MSA/MD median	5,893	3,498	59.36%	175	2.97%	1,131	19.19%	817	13.86%	272	4.62%
	80-99% of MSA/MD median	3,638	2,220	61.02%	113	3.11%	621	17.07%	514	14.13%	170	4.67%
	100-119% of MSA/MD median	3,109	1,903	61.27%	98	3.15%	514	16.53%	661	21.26%	133	4.28%
	120% or more of MSA/MD median	11,216	7,343	65.47%	377	3.36%	1,426	12.71%	1,556	13.87%	514	4.58%
	TOTAL	26,765	16,358	61.12%	870	3.25%	4,582	17.12%	3,939	14.72%	1,216	4.54%

Source: <https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/PA10900>

The table below lists the lending activity by racial/ethnic group.

Disposition of Loan Applications by Race/Ethnicity of Applicant												
Loan	Cohort	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
FHA, FSA/RHS, and VA	American Indian/Alaska Native	7	5	71.43%	0	0.00%	2	28.57%	0	0.00%	0	0.00%
	Asian	43	34	79.07%	2	4.65%	2	4.65%	4	9.30%	1	2.33%
	Black or African American	296	203	68.58%	6	2.03%	46	15.54%	35	11.82%	6	2.03%
	Native Hawaiian or Other Pacific Islander	23	13	56.52%	0	0.00%	2	8.70%	7	30.43%	1	4.35%
	White	4,061	3,037	74.78%	61	1.50%	392	9.65%	486	11.97%	85	2.09%
	2 or more minority races	6	3	50.00%	0	0.00%	0	0.00%	2	33.33%	1	16.67%
	Joint (White/Minority Race)	64	46	71.88%	0	0.00%	5	7.81%	10	15.63%	3	4.69%
	Race Not Available	543	338	62.25%	12	2.21%	110	20.26%	76	14.00%	7	1.29%
	Hispanic or Latino	938	664	70.79%	13	1.39%	134	14.29%	104	11.09%	23	2.45%
Conventional	American Indian/Alaska Native	22	14	63.64%	0	0.00%	3	13.64%	5	22.73%	0	0.00%
	Asian	377	288	76.39%	3	0.80%	38	10.08%	34	9.02%	14	3.71%
	Black or African American	194	136	70.10%	7	3.61%	28	14.43%	21	10.82%	2	1.03%
	Native Hawaiian or Other Pacific Islander	20	7	35.00%	0	0.00%	5	25.00%	7	35.00%	1	5.00%
	White	6,719	5,127	76.31%	161	2.40%	584	8.69%	734	10.92%	113	1.68%

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	2 or more minority races	6	3	50.00%	0	0.00%	0	0.00%	3	50.00%	0	0.00%
	Joint (White/Minority Race)	100	76	76.00%	2	2.00%	11	11.00%	11	11.00%	0	0.00%
	Race Not Available	911	612	67.18%	16	1.76%	108	11.86%	143	15.70%	32	3.51%
	Hispanic or Latino	630	423	67.14%	10	1.59%	106	16.83%	75	11.90%	16	2.54%
Refinance	American Indian/Alaska Native	40	12	30.00%	4	10.00%	14	35.00%	6	15.00%	4	10.00%
	Asian	213	102	47.89%	11	5.16%	39	18.31%	43	20.19%	18	8.45%
	Black or African American	314	108	34.39%	16	5.10%	94	29.94%	63	20.06%	33	10.51%
	Native Hawaiian or Other Pacific Islander	24	6	25.00%	1	4.17%	8	33.33%	8	33.33%	1	4.17%
	White	8,074	3,932	48.70%	423	5.24%	1,625	20.13%	1,451	17.97%	643	7.96%
	2 or more minority races	8	2	25.00%	0	0.00%	2	25.00%	4	50.00%	0	0.00%
	Joint (White/Minority Race)	100	41	41.00%	8	8.00%	27	27.00%	19	19.00%	5	5.00%
	Race Not Available	1,627	642	39.46%	61	3.75%	463	28.46%	311	19.11%	150	9.22%
	Hispanic or Latino	622	215	34.57%	28	4.50%	171	27.49%	148	23.79%	60	9.65%
Home Improvement	American Indian/Alaska Native	22	9	40.91%	0	0.00%	12	54.55%	1	4.55%	0	0.00%
	Asian	53	22	41.51%	2	3.77%	21	39.62%	6	11.32%	2	3.77%
	Black or African American	97	26	26.80%	3	3.09%	58	59.79%	7	7.22%	3	3.09%
	Native Hawaiian or Other Pacific Islander	9	1	11.11%	0	0.00%	7	77.78%	0	0.00%	1	11.11%

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Total	White	2,444	1,374	56.22%	63	2.58%	741	30.32%	194	7.94%	72	2.95%
	2 or more minority races	4	1	25.00%	0	0.00%	3	75.00%	0	0.00%	0	0.00%
	Joint (White/Minority Race)	36	18	50.00%	0	0.00%	14	38.89%	2	5.56%	2	5.56%
	Race Not Available	308	120	38.96%	8	2.60%	118	38.31%	46	14.94%	16	5.19%
	Hispanic or Latino	207	62	29.95%	1	0.48%	117	56.52%	16	7.73%	11	5.31%
	American Indian/Alaska Native	91	40	43.96%	4	4.40%	31	34.07%	12	13.19%	4	4.40%
	Asian	686	446	65.01%	18	2.62%	100	14.58%	87	12.68%	35	5.10%
	Black or African American	901	473	52.50%	32	3.55%	226	25.08%	126	13.98%	44	4.88%
	Native Hawaiian or Other Pacific Islander	76	27	35.53%	1	1.32%	22	28.95%	22	28.95%	4	5.26%
	White	21,298	13,470	63.25%	708	3.32%	3,342	15.69%	2,865	13.45%	913	4.29%
	2 or more minority races	24	9	37.50%	0	0.00%	5	20.83%	9	37.50%	1	4.17%
Total	Joint (White/Minority Race)	300	181	60.33%	10	3.33%	57	19.00%	42	14.00%	10	3.33%
	Race Not Available	3,389	1,712	50.52%	97	2.86%	799	23.58%	576	17.00%	205	6.05%
	Hispanic or Latino	2,397	1,364	56.90%	52	2.17%	528	22.03%	343	14.31%	110	4.59%
	Total	29,162	17,722	60.77%	922	3.16%	5,110	17.52%	4,082	14.00%	1,326	4.55%

Source: <https://ffiec.cfbp.gov/data-publication/aggregate-reports/2017/MD/41540>

The following tables will compare denial rates per racial/ethnic group and income to identify any group that may have higher denial rates than another. Higher denial rates are highlighted.

Disposition of Loan Applications by Race/Ethnicity and Income of Applicant												
Less than 50% of MSA/MD Median - Allentown, Bethlehem, Easton MSA												
Loan	Cohort	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
FHA, FSA/RHS, and VA	American Indian/Alaska Native	2	1	50.00%	0	0.00%	1	50.00%	0	0.00%	0	0.00%
	Asian	5	5	100.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
	Black or African American	31	20	64.52%	0	0.00%	9	29.03%	2	6.45%	0	0.00%
	Native Hawaiian or Other Pacific Islander	3	1	33.33%	0	0.00%	1	33.33%	1	33.33%	0	0.00%
	White	591	411	69.54%	14	2.37%	89	15.06%	61	10.32%	16	2.71%
	2 or more minority races	0	0	-	0	-	0	-	0	-	0	-
	Joint (White/Minority Race)	1	1	100.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
	Race Not Available	87	47	54.02%	1	1.15%	26	29.89%	13	14.94%	0	0.00%
	Hispanic or Latino	276	190	68.84%	6	2.17%	47	17.03%	26	9.42%	7	2.54%
Conventional	American Indian/Alaska Native	4	3	75.00%	0	0.00%	1	25.00%	0	0.00%	0	0.00%
	Asian	33	21	63.64%	0	0.00%	9	27.27%	2	6.06%	1	3.03%
	Black or African American	26	21	80.77%	1	3.85%	3	11.54%	1	3.85%	0	0.00%
	Native Hawaiian or Other Pacific Islander	5	1	20.00%	0	0.00%	2	40.00%	2	40.00%	0	0.00%

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	White	510	339	66.47%	14	2.75%	104	20.39%	45	8.82%	8	1.57%
	2 or more minority races	0	0	-	0	-	0	-	0	-	0	-
	Joint (White/Minority Race)	2	2	100.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
	Race Not Available	64	35	54.69%	0	0.00%	18	28.13%	8	12.50%	3	4.69%
	Hispanic or Latino	131	87	66.41%	1	0.76%	33	25.19%	9	6.87%	1	0.76%
Refinance	American Indian/Alaska Native	10	2	20.00%	1	10.00%	5	50.00%	1	10.00%	1	10.00%
	Asian	13	3	23.08%	0	0.00%	4	30.77%	6	46.15%	0	0.00%
	Black or African American	51	6	11.76%	4	7.84%	20	39.22%	16	31.37%	5	9.80%
	Native Hawaiian or Other Pacific Islander	1	0	0.00%	0	0.00%	0	0.00%	1	100.00%	0	0.00%
	White	919	317	34.49%	55	5.98%	309	33.62%	176	19.15%	62	6.75%
	2 or more minority races	2	2	100.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
	Joint (White/Minority Race)	9	1	11.11%	0	0.00%	6	66.67%	0	0.00%	2	22.22%
	Race Not Available	185	43	23.24%	8	4.32%	82	44.32%	34	18.38%	18	9.73%
	Hispanic or Latino	145	39	26.90%	4	2.76%	58	40.00%	33	22.76%	11	7.59%
Home Improvement	American Indian/Alaska Native	5	0	0.00%	0	0.00%	5	100.00%	0	0.00%	0	0.00%
	Asian	8	2	25.00%	1	12.50%	5	62.50%	0	0.00%	0	0.00%
	Black or African American	24	1	4.17%	2	8.33%	16	66.67%	4	16.67%	1	4.17%
	Native Hawaiian or Other Pacific Islander	3	0	0.00%	0	0.00%	3	100.00%	0	0.00%	0	0.00%

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Total	White	284	107	37.68%	6	2.11%	147	51.76%	15	5.28%	9	3.17%
	2 or more minority races	1	0	0.00%	0	0.00%	1	100.00%	0	0.00%	0	0.00%
	Joint (White/Minority Race)	0	0	-	0	-	0	-	0	-	0	-
	Race Not Available	30	2	6.67%	0	0.00%	24	80.00%	3	10.00%	1	3.33%
	Hispanic or Latino	53	4	7.55%	0	0.00%	44	83.02%	2	3.77%	3	5.66%
	American Indian/Alaska Native	21	6	28.57%	1	4.76%	12	57.14%	1	4.76%	1	4.76%
	Asian	59	31	52.54%	1	1.69%	48	81.36%	8	13.56%	1	1.69%
	Black or African American	132	48	36.36%	7	5.30%	49	36.36%	23	17.42%	6	4.55%
	Native Hawaiian or Other Pacific Islander	12	2	16.67%	0	0.00%	8	50.00%	4	33.33%	0	0.00%
	White	2304	1174	50.95%	89	3.86%	649	28.17%	297	12.89%	95	4.12%
	2 or more minority races	3	2	66.67%	0	0.00%	1	33.33%	0	0.00%	0	0.00%
Total	Joint (White/Minority Race)	12	4	33.33%	0	0.00%	6	50.00%	0	0.00%	2	16.67%
	Race Not Available	366	127	34.70%	9	2.46%	150	40.98%	58	15.85%	22	6.01%
	Hispanic or Latino	605	320	52.89%	11	1.82%	182	30.08%	70	11.57%	22	3.64%
	Total	3,514	1,714	48.78%	118	3.36%	1,072	30.51%	461	13.12%	149	4.24%

Source: <https://ffec.cfpb.gov/data-publication/aggregate-reports/2017/MD/41540>

For loan applicants under 50% of MSA/MD Median income the following groups had denial rates that were 10% higher than the average denial rate:

- American Indian/Alaska Native FHA,FSA/RHS/, and VA loan denial rates of 50% (17.50% Average)
- Black or African American FHA,FSA/RHS/, and VA loan denial rates of 29.03% (17.50% Average)

- Native Hawaiian or Other Pacific Islander FHA,FSA/RHS/, and VA loan denial rates of 33.33 (17.50% Average)
- Race Not Available FHA,FSA/RHS/, and VA loan denial rates of 29.89% (17.50% Average)
- Native Hawaiian or Other Pacific Islander conventional loan denial rates of 40% (21.27% Average)
- American Indian or Alaskan Native refinance loan denial rate of 50.00% (35.80% Average)
- Black or African American home improvement loan denial rate of 73.9% (61.3% Average)
- Joint refinance loan denial rate of 66.67% (35.80% Average)
- Black or African American home improvement denial rate of 66.67% (56.62% Average)
- Native Hawaiian or Other Pacific Island home improvement denial rate of 100.00% (56.62% Average)
- Two or more minority races home improvement denial rate of 100.00% (56.62% Average)
- Race Not Available home improvement denial rate of 80.00% (56.62% Average)
- Hispanic or Latino home improvement denial rate of 83.02% (56.62% Average)

Disposition of Loan Applications by Race/Ethnicity and Income of Applicant												
50-79% of MSA/MD Median												
Loan	Cohort	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
FHA, FSA/RHS, and VA	American Indian/Alaska Native	3	2	66.67%	0	0.00%	1	33.33%	0	0.00%	0	0.00%
	Asian	7	6	85.71%	0	0.00%	0	0.00%	1	14.29%	0	0.00%
	Black or African American	99	67	67.68%	3	3.03%	16	16.16%	12	12.12%	1	1.01%
	Native Hawaiian or Other Pacific Islander	9	7	77.78%	0	0.00%	0	0.00%	2	22.22%	0	0.00%
	White	1,344	1001	74.48%	19	1.41%	131	9.75%	161	11.98%	32	2.38%

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Conventional	2 or more minority races	1	1	100.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
	Joint (White/Minority Race)	10	8	80.00%	0	0.00%	2	20.00%	0	0.00%	0	0.00%
	Race Not Available	162	104	64.20%	5	3.09%	35	21.60%	17	10.49%	1	0.62%
	Hispanic or Latino	346	256	73.99%	2	0.58%	44	12.72%	35	10.12%	9	2.60%
	American Indian/Alaska Native	5	3	60.00%	0	0.00%	1	20.00%	1	20.00%	0	0.00%
	Asian	62	47	75.81%	1	1.61%	6	9.68%	5	8.06%	3	4.84%
	Black or African American	31	21	67.74%	1	3.23%	5	16.13%	4	12.90%	0	0.00%
	Native Hawaiian or Other Pacific Islander	3	1	33.33%	0	0.00%	2	66.67%	0	0.00%	0	0.00%
	White	1,329	975	73.36%	36	2.71%	152	11.44%	139	10.46%	27	2.03%
	2 or more minority races	1	1	100.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
	Joint (White/Minority Race)	9	5	55.56%	0	0.00%	3	33.33%	1	11.11%	0	0.00%
	Race Not Available	459	108	23.53%	2	1.26%	25	15.72%	20	12.58%	4	2.52%
	Hispanic or Latino	184	120	65.22%	4	2.17%	38	20.65%	16	8.70%	6	3.26%
	American Indian/Alaska Native	11	5	45.45%	0	0.00%	5	45.45%	1	9.09%	0	0.00%
	Asian	34	14	41.18%	1	2.94%	10	29.41%	8	23.53%	1	2.94%
Refinance	Black or African American	81	23	28.40%	2	2.47%	29	35.80%	17	20.99%	10	12.35%
	Native Hawaiian or Other Pacific Islander	7	0	0.00%	0	0.00%	5	71.43%	1	14.29%	1	14.29%
	White	1,624	722	44.46%	83	5.11%	374	23.03%	304	18.72%	141	8.68%

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	2 or more minority races	1	0	0.00%	0	0.00%	1	100.00%	0	0.00%	0	0.00%
	Joint (White/Minority Race)	9	2	22.22%	0	0.00%	6	66.67%	0	0.00%	1	11.11%
	Race Not Available	331	126	38.07%	9	2.72%	97	29.31%	71	21.45%	28	8.46%
	Hispanic or Latino	167	68	40.72%	11	6.59%	38	22.75%	36	21.56%	14	8.38%
Home Improvement	American Indian/Alaska Native	6	4	66.67%	0	0.00%	2	33.33%	0	0.00%	0	0.00%
	Asian	11	5	45.45%	0	0.00%	6	54.55%	0	0.00%	0	0.00%
	Black or African American	24	8	33.33%	0	0.00%	16	66.67%	0	0.00%	0	0.00%
	Native Hawaiian or Other Pacific Islander	2	0	0.00%	0	0.00%	2	100.00%	0	0.00%	0	0.00%
	White	452	212	46.90%	12	2.65%	171	37.83%	40	8.85%	17	3.76%
	2 or more minority races	0	0	-	0	-	0	-	0	-	0	-
	Joint (White/Minority Race)	3	0	0.00%	0	0.00%	2	66.67%	0	0.00%	1	33.33%
	Race Not Available	63	20	31.75%	1	1.59%	26	41.27%	12	19.05%	4	6.35%
	Hispanic or Latino	59	18	30.51%	0	0.00%	33	55.93%	4	6.78%	4	6.78%
Total	American Indian/Alaska Native	25	14	56.00%	0	0.00%	9	36.00%	2	8.00%	0	0.00%
	Asian	114	72	63.16%	2	1.75%	22	19.30%	14	12.28%	4	3.51%
	Black or African American	235	119	50.64%	6	2.55%	66	28.09%	33	14.04%	11	4.68%
	Native Hawaiian or Other Pacific Islander	21	8	38.10%	0	0.00%	9	42.86%	3	14.29%	1	4.76%
	White	4,749	2,910	61.28%	150	3.16%	828	17.44%	644	13.56%	217	4.57%

2 or more minority races	3	2	66.67%	0	0.00%	1	33.33%	0	0.00%	0	0.00%
Joint (White/Minority Race)	31	15	48.39%	0	0.00%	13	41.94%	1	3.23%	2	6.45%
Race Not Available	715	358	50.07%	17	2.38%	183	25.59%	120	16.78%	37	5.17%
Hispanic or Latino	756	462	61.11%	17	2.25%	153	20.24%	91	12.04%	33	4.37%
Total	6,649	3,960	59.56%	192	2.89%	1,284	19.31%	908	13.66%	305	4.59%

Source: <https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/MD/41540>

For loan applicants 50-79% of MSA/MD Median income the following groups had denial rates that were 10% higher than the average denial rate:

- American Indian/Alaska Native FHA, FSA/RHS, and VA loan denial rate of 33.33% (11.31% Average)
- Race Not Available FHA, FSA/RHS, and VA loan denial rate of 21.60% (11.31% Average)
- Native Hawaiian or Other Pacific Islander conventional loan denial rate of 66.67% (12.13% Average)
- Joint conventional loan denial rate of 33.33% (12.13% Average)
- American Indian/Alaska Native refinance loan denial rate of 45.45% (25.12% Average)
- Black or African American refinance loan denial rate of 35.80% (25.12% Average)
- Native Hawaiian or Other Pacific Islander refinance loan denial rate of 71.43% (25.12% Average)
- Joint refinance loan denial rate of 66.67% (25.12% Average)
- Asian home improvement loan denial rate of 54.55% (40.11% Average)
- Black or African American home improvement loan denial rate of 66.67% (40.11% Average)
- Joint home improvement loan denial rate of 66.67% (40.11% Average)
- Hispanic or Latino home improvement loan denial rate of 55.93% (40.11% Average)

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Disposition of Loan Applications by Race/Ethnicity and Income of Applicant												
80-99% of MSA/MD Median												
Loan	Cohort	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
FHA, FSA/RHS, and VA	American Indian/Alaska Native	0	0	-	0	-	0	-	0	-	0	-
	Asian	9	7	77.78%	1	11.11%	0	0.00%	1	11.11%	0	0.00%
	Black or African American	60	40	66.67%	1	1.67%	7	11.67%	9	15.00%	3	5.00%
	Native Hawaiian or Other Pacific Islander	6	3	50.00%	0	0.00%	0	0.00%	2	33.33%	1	16.67%
	White	682	513	75.22%	14	2.05%	57	8.36%	87	12.76%	11	1.61%
	2 or more minority races	2	1	50.00%	0	0.00%	0	0.00%	1	50.00%	0	0.00%
	Joint (White/Minority Race)	8	6	75.00%	0	0.00%	0	0.00%	2	25.00%	0	0.00%
	Race Not Available	103	65	63.11%	0	0.00%	19	18.45%	15	14.56%	4	3.88%
	Hispanic or Latino	133	92	69.17%	2	1.50%	20	15.04%	17	12.78%	2	1.50%
Conventional	American Indian/Alaska Native	6	3	50.00%	0	0.00%	1	16.67%	2	33.33%	0	0.00%
	Asian	39	29	74.36%	0	0.00%	6	15.38%	2	5.13%	2	5.13%
	Black or African American	29	16	55.17%	3	10.34%	4	13.79%	6	20.69%	0	0.00%
	Native Hawaiian or Other Pacific Islander	2	0	0.00%	0	0.00%	1	50.00%	0	0.00%	1	50.00%
	White	838	626	74.70%	21	2.51%	86	10.26%	91	10.86%	14	1.67%
	2 or more minority races	3	0	0.00%	0	0.00%	0	0.00%	3	100.00%	0	0.00%
	Joint (White/Minority Race)	10	7	70.00%	1	10.00%	2	20.00%	0	0.00%	0	0.00%
	Race Not Available	106	71	66.98%	1	0.94%	16	15.09%	14	13.21%	4	3.77%
	Hispanic or Latino	70	43	61.43%	1	1.43%	10	14.29%	13	18.57%	3	4.29%
Refinance	American Indian/Alaska Native	5	0	0.00%	1	20.00%	1	20.00%	2	40.00%	1	20.00%
	Asian	22	11	50.00%	2	9.09%	3	13.64%	2	9.09%	4	18.18%
	Black or African American	38	16	42.11%	3	7.89%	11	28.95%	5	13.16%	3	7.89%

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	Native Hawaiian or Other Pacific Islander	4	1	25.00%	0	0.00%	2	50.00%	1	25.00%	0	0.00%
	White	1,058	503	47.54%	46	4.35%	211	19.94%	205	19.38%	93	8.79%
	2 or more minority races	1	0	0.00%	0	0.00%	1	100.00%	0	0.00%	0	0.00%
	Joint (White/Minority Race)	7	4	57.14%	0	0.00%	3	42.86%	0	0.00%	0	0.00%
	Race Not Available	207	91	43.96%	9	4.35%	56	27.05%	35	16.91%	16	7.73%
	Hispanic or Latino	77	21	27.27%	4	5.19%	27	35.06%	18	23.38%	7	9.09%
Home Improvement	American Indian/Alaska Native	2	1	50.00%	0	0.00%	1	50.00%	0	0.00%	0	0.00%
	Asian	4	1	25.00%	0	0.00%	2	50.00%	0	0.00%	1	25.00%
	Black or African American	11	1	9.09%	1	9.09%	8	72.73%	0	0.00%	1	9.09%
	Native Hawaiian or Other Pacific Islander	1	0	0.00%	0	0.00%	1	100.00%	0	0.00%	0	0.00%
	White	336	185	55.06%	5	1.49%	111	33.04%	26	7.74%	9	2.68%
	2 or more minority races	0	0	-	0	-	0	-	0	-	0	-
	Joint (White/Minority Race)	8	3	37.50%	0	0.00%	4	50.00%	1	12.50%	0	0.00%
	Race Not Available	31	16	51.61%	4	12.90%	7	22.58%	2	6.45%	2	6.45%
	Hispanic or Latino	23	6	26.09%	0	0.00%	12	52.17%	3	13.04%	2	8.70%
Total	American Indian/Alaska Native	13	4	30.77%	1	7.69%	3	23.08%	4	30.77%	1	7.69%
	Asian	74	48	64.86%	3	4.05%	11	14.86%	5	6.76%	7	9.46%
	Black or African American	138	73	52.90%	8	5.80%	30	21.74%	20	14.49%	7	5.07%
	Native Hawaiian or Other Pacific Islander	13	4	30.77%	0	0.00%	4	30.77%	3	23.08%	2	15.38%
	White	2,914	1,827	62.70%	86	2.95%	465	15.96%	409	14.04%	127	4.36%
	2 or more minority races	6	1	16.67%	0	0.00%	1	16.67%	4	66.67%	0	0.00%
	Joint (White/Minority Race)	33	20	60.61%	1	3.03%	9	27.27%	3	9.09%	0	0.00%
	Race Not Available	447	243	54.36%	14	3.13%	98	21.92%	66	14.77%	26	5.82%
	Hispanic or Latino	303	162	53.47%	7	2.31%	69	22.77%	51	16.83%	14	4.62%

	Total	3,941	2,382	60.44%	120	3.04%	890	17.51%	565	14.34%	184	4.67%
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Source: <https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/MD/41540>

For loan applicants 80-99% of MSA/MD Median income the following groups had denial rates that were 10% higher than the average denial rate:

- Native Hawaiian or Other Pacific Islander conventional loan denial rate of 50.00% (11.23% Average)
- Native Hawaiian or Other Pacific Islander refinance loan denial rate of 50.00% (21.46% Average)
- Two or More Minority Races refinance loan denial rate of 100.00% (21.46% Average)
- Joint refinance loan denial rate of 42.86% (21.46% Average)
- Hispanic or Latino refinance loan denial rate of 35.06% (21.46% Average)
- American Indian or Alaska Native home improvement loan denial rate of 50.00% (34.10% Average)
- Asian home improvement loan denial rate of 50.00% (34.10% Average)
- Black or African American home improvement loan denial rate of 72.73% (34.10% Average)
- Native Hawaiian or Other Pacific Islander home improvement loan denial rate of 100.00% (34.10% Average)
- Joint home improvement loan denial rate of 50.00% (34.10% Average)
- Hispanic or Latino home improvement loan denial rate of 52.17% (34.10% Average)

Disposition of Loan Applications by Race/Ethnicity and Income of Applicant												
100-119% of MSA/MD Median												
Loan	Cohort	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
FHA, FSA/RHS, and VA	American Indian/Alaska Native	1	1	100.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
	Asian	8	7	87.50%	0	0.00%	1	12.50%	0	0.00%	0	0.00%
	Black or African American	35	28	80.00%	0	0.00%	2	5.71%	4	11.43%	1	2.86%
	Native Hawaiian or Other Pacific Islander	2	0	0.00%	0	0.00%	1	50.00%	1	50.00%	0	0.00%
	White	495	379	76.57%	5	1.01%	34	6.87%	69	13.94%	8	1.62%

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	2 or more minority races	1	1	100.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
	Joint (White/Minority Race)	15	11	73.33%	0	0.00%	0	0.00%	3	20.00%	1	6.67%
	Race Not Available	81	50	61.73%	2	2.47%	12	14.81%	17	20.99%	0	0.00%
	Hispanic or Latino	84	57	67.86%	1	1.19%	10	11.90%	15	17.86%	1	1.19%
Conventional	American Indian/Alaska Native	2	0	0.00%	0	0.00%	0	0.00%	2	100.00%	0	0.00%
	Asian	25	17	68.00%	1	4.00%	2	8.00%	3	12.00%	2	8.00%
	Black or African American	18	13	72.22%	0	0.00%	5	27.78%	0	0.00%	0	0.00%
	Native Hawaiian or Other Pacific Islander	4	3	75.00%	0	0.00%	0	0.00%	1	25.00%	0	0.00%
	White	709	550	77.57%	12	1.69%	68	9.59%	68	9.59%	11	1.55%
	2 or more minority races	1	1	100.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
	Joint (White/Minority Race)	12	7	58.33%	0	0.00%	2	16.67%	3	25.00%	0	0.00%
	Race Not Available	102	75	73.53%	0	0.00%	7	6.86%	20	19.61%	0	0.00%
	Hispanic or Latino	59	42	71.19%	0	0.00%	8	13.56%	8	13.56%	1	1.69%
	American Indian/Alaska Native	0	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Refinance	Asian	25	12	48.00%	2	8.00%	4	16.00%	4	16.00%	3	12.00%
	Black or African American	27	14	51.85%	1	3.70%	9	33.33%	1	3.70%	2	7.41%
	Native Hawaiian or Other Pacific Islander	5	3	60.00%	1	20.00%	0	0.00%	1	20.00%	0	0.00%
	White	1,007	481	47.77%	51	5.06%	201	19.96%	195	19.36%	79	7.85%
	2 or more minority races	1	0	0.00%	0	0.00%	0	0.00%	1	100.00%	0	0.00%
	Joint (White/Minority Race)	9	4	44.44%	2	22.22%	2	22.22%	1	11.11%	0	0.00%
	Race Not Available	194	70	36.08%	10	5.15%	63	32.47%	33	17.01%	18	9.28%
	Hispanic or Latino	85	27	31.76%	3	3.53%	25	29.41%	23	27.06%	7	8.24%
	American Indian/Alaska Native	5	3	60.00%	0	0.00%	1	20.00%	1	20.00%	0	0.00%
Home Improvement	Asian	4	1	25.00%	0	0.00%	1	25.00%	1	25.00%	1	25.00%

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Total	Black or African American	6	1	16.67%	0	0.00%	5	83.33%	0	0.00%	0	0.00%
	Native Hawaiian or Other Pacific Islander	1	0	0.00%	0	0.00%	1	100.00%	0	0.00%	0	0.00%
	White	278	158	56.83%	10	3.60%	78	28.06%	26	9.35%	6	2.16%
	2 or more minority races	2	0	0.00%	0	0.00%	2	100.00%	0	0.00%	0	0.00%
	Joint (White/Minority Race)	1	0	0.00%	0	0.00%	1	100.00%	0	0.00%	0	0.00%
	Race Not Available	33	13	39.39%	1	3.03%	12	36.36%	6	18.18%	1	3.03%
	Hispanic or Latino	18	8	44.44%	1	5.56%	6	33.33%	2	11.11%	1	5.56%
	American Indian/Alaska Native	8	4	50.00%	0	0.00%	1	12.50%	3	37.50%	0	0.00%
	Asian	62	37	59.68%	3	4.84%	8	12.90%	8	12.90%	6	9.68%
	Black or African American	86	56	65.12%	1	1.16%	21	24.42%	5	5.81%	3	3.49%
	Native Hawaiian or Other Pacific Islander	12	6	50.00%	1	8.33%	2	16.67%	3	25.00%	0	0.00%
	White	2,489	1,568	63.00%	78	3.13%	381	15.31%	358	14.38%	104	4.18%
	2 or more minority races	5	2	40.00%	0	0.00%	2	40.00%	1	20.00%	0	0.00%
	Joint (White/Minority Race)	37	22	59.46%	2	5.41%	5	13.51%	7	18.92%	1	2.70%
	Race Not Available	410	208	50.73%	13	3.17%	94	22.93%	76	18.54%	19	4.63%
	Hispanic or Latino	246	134	54.47%	5	2.03%	49	19.92%	48	19.51%	10	4.07%
	Total	3,355	2,037	60.72%	103	3.07%	563	16.78%	509	15.17%	143	4.26%

Source: <https://ffiec.cfbp.gov/data-publication/aggregate-reports/2017/MD/41540>

For loan applicants 100-119% of MSA/MD Median income the following groups had denial rates that were 10% higher than the average denial rate:

- Native Hawaiian or Other Pacific Islander FHA, FSA/RHS, and VA loan denial rate of 50.0% (7.84% Average)
- Black or African American conventional loan denial rate of 27.78% (9.62% Average)
- Black or African American refinance loan denial rate of 33.33% (22.00% Average)
- Race Not Available refinance loan denial rate of 32.47% (22.00% Average)

- Black or African American home improvement loan denial rate of 83.33% (30.61% Average)
- Native Hawaiian or Other Pacific Islander home improvement loan denial rate of 100.00% (30.61% Average)
- Two or More Minority Races home improvement loan denial rate of 100.0% (30.61% Average)
- Joint home improvement loan denial rate of 100.00% (30.61%Average)

Disposition of Loan Applications by Race/Ethnicity and Income of Applicant												
120% or More of MSA/MD Median												
Loan	Cohort	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
FHA, FSA/RHS, and VA	American Indian/Alaska Native	1	1	100.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
	Asian	14	9	64.29%	1	7.14%	1	7.14%	2	14.29%	1	7.14%
	Black or African American	71	48	67.61%	2	2.62%	12	16.90%	8	11.27%	1	1.41%
	Native Hawaiian or Other Pacific Islander	3	2	66.67%	0	0.00%	0	0.00%	1	33.33%	0	0.00%
	White	949	733	77.24%	9	0.95%	81	8.54%	108	11.38%	18	1.90%
	2 or more minority races	2	0	0.00%	0	0.00%	0	0.00%	1	50.00%	1	50.00%
	Joint (White/Minority Race)	30	20	66.67%	0	0.00%	3	10.00%	5	16.67%	2	6.67%
	Race Not Available	110	72	65.45%	4	3.64%	18	16.36%	14	12.73%	2	1.82%
	Hispanic or Latino	99	69	69.70%	2	2.02%	13	13.13%	11	11.11%	4	4.04%
Conventional	American Indian/Alaska Native	5	5	100.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
	Asian	218	174	79.82%	1	0.46%	15	6.88%	22	10.09%	6	2.75%

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	Black or African American	90	65	72.22%	2	2.22%	11	12.22%	10	11.11%	2	2.22%
	Native Hawaiian or Other Pacific Islander	6	2	33.33%	0	0.00%	0	0.00%	4	66.67%	0	0.00%
	White	3,333	2,637	79.12%	78	2.34%	174	5.22%	391	11.73%	53	1.59%
	2 or more minority races	1	1	100.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
	Joint (White/Minority Race)	67	55	82.09%	1	1.49%	4	5.97%	7	10.45%	0	0.00%
	Race Not Available	480	323	67.29%	13	2.71%	42	8.75%	81	16.88%	21	4.38%
	Hispanic or Latino	186	131	70.43%	4	2.15%	17	9.14%	29	15.59%	5	2.69%
Refinance	American Indian/Alaska Native	14	5	35.71%	2	14.29%	3	21.43%	2	14.29%	2	14.29%
	Asian	119	62	52.10%	6	5.04%	18	15.13%	23	19.33%	10	8.40%
	Black or African American	117	49	41.88%	6	5.13%	25	21.37%	24	20.51%	13	11.11%
	Native Hawaiian or Other Pacific Islander	7	2	28.57%	0	0.00%	1	14.29%	4	57.14%	0	0.00%
	White	3,466	1,909	55.08%	188	5.42%	530	15.29%	571	16.47%	268	7.73%
	2 or more minority races	3	0	0.00%	0	0.00%	0	0.00%	3	100.00%	0	0.00%
	Joint (White/Minority Race)	66	30	45.45%	6	9.09%	10	15.15%	18	27.27%	2	3.03%
	Race Not Available	710	312	43.94%	25	3.52%	165	23.24%	138	19.44%	70	9.86%
	Hispanic or Latino	148	60	40.54%	6	4.05%	23	15.54%	38	25.68%	21	14.19%
Home Improvement	American Indian/Alaska Native	4	1	25.00%	0	0.00%	3	75.00%	0	0.00%	0	0.00%
	Asian	26	13	50.00%	1	3.85%	7	26.92%	5	19.23%	0	0.00%

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Total	Black or African American	32	15	46.88%	0	0.00%	13	40.63%	3	9.38%	1	3.13%
	Native Hawaiian or Other Pacific Islander	2	1	50.00%	0	0.00%	0	0.00%	0	0.00%	1	50.00%
	White	1,094	712	65.08%	30	2.74%	234	21.39%	87	7.95%	31	2.83%
	2 or more minority races	1	1	100.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
	Joint (White/Minority Race)	24	15	62.50%	0	0.00%	7	29.17%	1	4.17%	1	4.17%
	Race Not Available	151	69	45.70%	2	1.32%	49	32.45%	23	15.23%	8	5.30%
	Hispanic or Latino	54	26	48.15%	0	0.00%	22	40.74%	5	9.26%	1	1.85%
	American Indian/Alaska Native	24	12	50.00%	2	8.33%	6	25.00%	2	8.33%	2	8.33%
	Asian	377	258	68.44%	5	1.33%	41	10.88%	52	13.79%	17	4.51%
	Black or African American	310	177	57.10%	10	3.23%	61	19.68%	45	14.52%	17	5.48%
	Native Hawaiian or Other Pacific Islander	18	7	38.89%	0	0.00%	1	5.56%	9	50.00%	1	5.56%
	White	8,842	5,991	67.76%	305	3.45%	1,019	11.52%	1,157	13.09%	370	4.18%
	2 or more minority races	7	2	28.57%	0	0.00%	0	0.00%	4	57.14%	1	14.29%
	Joint (White/Minority Race)	187	120	64.17%	7	3.74%	24	12.83%	31	16.58%	5	2.67%
	Race Not Available	1,451	776	53.48%	44	3.03%	274	18.88%	256	17.64%	101	6.96%
	Hispanic or Latino	487	286	58.73%	12	2.46%	75	15.40%	83	17.04%	31	6.37%
	Total	11,703	7,629	65.19%	389	3.32%	1,501	12.83%	1,639	14.00%	545	4.66%

Source: <https://ffiec.cfpb.gov/data-publication/aggregate-reports/2017/MD/41540>

For loan applicants 120% and over MSA/MD Median income the following groups had denial rates that were 10% higher than the average denial rate:

- American Indian or Alaska Native home improvement loan denial rate of 75.00% (23.46% Average)
- Black or African American home improvement loan denial rate of 40.63% (23.46% Average)
- Hispanic or Latino home improvement loan denial rate of 40.74% (23.46% Average)

Disposition of Loan Applications by Characteristics of Census Tract												
FHA, FSA/RHS and VA Loans												
	Cohort	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
Racial/Ethnic Composition	Less than 10% minority	1,512	1,086	29.4%	26	32.1%	169	28.3%	201	31.9%	30	28.6%
	10-19% minority	1,514	1,122	30.4%	23	28.4%	146	24.5%	192	30.4%	31	29.5%
	20-49% minority	1,376	987	26.7%	17	21.0%	172	28.8%	167	26.5%	33	31.4%
	50-79% minority	573	413	11.2%	10	12.3%	83	13.9%	59	9.4%	8	7.6%
	80-100% minority	130	83	2.2%	5	6.2%	27	4.5%	12	1.9%	3	2.9%
Income Characteristics	Low income	220	153	4.1	6	7.4	34	5.7	22	3.5	5	4.8
	Moderate income	1,164	830	22.5	24	29.6	155	26.0	138	21.9	17	16.2
	Middle income	2,314	1,699	46.0	35	43.2	249	41.7	274	43.4	57	54.3
	Upper income	1,407	1,009	27.3	16	19.8	159	26.6	197	31.2	26	24.8
Low Income	Less than 10% minority	7	5	3.3	0	0.0	2	5.9	0	0.0	0	0.0
	10-19% minority	0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
	20-49% minority	0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0

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	50-79% minority	145	102	66.7	3	50.0	21	61.8	16	72.7	3	60.0
	80-100% minority	68	46	30.1	3	50.0	11	32.4	6	27.3	2	40.0
Moderate Income	Less than 10% minority	154	111	13.4	1	4.2	19	12.3	20	14.5	3	17.6
	10-19% minority	160	109	13.1	4	16.7	19	12.3	25	18.1	3	17.6
	20-49% minority	428	310	37.3	10	41.7	48	31.0	53	38.4	7	41.2
	50-79% minority	360	263	31.7	7	29.2	53	34.2	34	24.6	3	17.6
	80-100% minority	62	37	4.5	2	8.3	16	10.3	6	4.3	1	5.9
Middle Income	Less than 10% minority	987	716	42.1	21	60.0	107	43.0	123	44.9	20	35.1
	10-19% minority	762	580	34.1	10	28.6	71	28.5	84	30.7	17	29.8
	20-49% minority	497	355	20.9	4	11.4	62	24.9	58	21.2	18	31.6
	50-79% minority	68	48	2.8	0	0.0	9	3.6	9	3.3	2	3.5
	80-100% minority	0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Upper Income	Less than 10% minority	364	254	25.2	4	25.0	41	25.8	58	29.4	7	26.9
	10-19% minority	592	433	42.9	9	56.3	56	35.2	83	42.1	11	42.3
	20-49% minority	451	322	31.9	3	18.8	62	39.0	56	28.4	8	30.8
	50-79% minority	0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
	80-100% minority	0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0

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Disposition of Loan Applications by Characteristics of Census Tract												
Conventional Loans												
	Cohort	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
Racial/Ethnic Composition	Less than 10% minority	2,734	2,005	30.9	60	30.8	284	35.1	328	33.5	57	34.3
	10-19% minority	3,032	2,323	35.8	80	41.0	234	28.9	335	34.3	60	36.1
	20-49% minority	2,201	1,678	25.9	43	22.1	195	24.1	245	25.1	40	24.1
	50-79% minority	506	369	5.7	7	3.6	73	9.0	50	5.1	7	4.2
	80-100% minority	164	113	1.7	5	2.6	24	3.0	20	2.0	2	1.2
Income Characteristics	Low income	299	213	3.3	7	3.6	43	5.3	30	3.1	6	3.6
	Moderate income	1,172	866	13.3	25	12.8	133	16.4	131	13.4	17	10.2
	Middle income	3,340	2,464	38.3	85	43.6	330	40.7	383	39.2	58	34.9
	Upper income	3,826	2,925	45.1	78	40.0	304	37.5	434	44.4	85	51.2
Low Income	Less than 10% minority	5	4	1.9	0	0.0	1	2.3	0	0.0	0	0.0
	10-19% minority	0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
	20-49% minority	0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
	50-79% minority	171	124	58.2	2	28.6	27	62.8	14	46.7	4	66.7
	80-100% minority	123	85	39.9	5	71.4	15	34.9	16	53.3	2	33.3
Moderate Income	Less than 10% minority	135	103	11.9	2	8.0	18	13.5	11	8.4	1	5.9

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	10-19% minority	262	195	22.5	4	16.0	21	15.8	35	26.7	7	41.2
	20-49% minority	451	336	38.8	14	56.0	44	33.1	50	38.2	7	41.2
	50-79% minority	283	204	23.6	5	20.0	41	30.8	31	23.7	2	11.8
	80-100% minority	41	28	3.2	0	0.0	9	6.8	4	3.1	0	0.0
Middle Income	Less than 10% minority	1,571	1,129	45.5	42	49.4	182	55.2	189	49.3	29	50.0
	10-19% minority	1,035	796	32.0	31	36.5	85	25.8	108	28.2	15	25.9
	20-49% minority	682	518	20.9	12	14.1	58	17.6	81	21.1	13	22.4
	50-79% minority	52	41	1.7	0	0.0	5	1.5	5	1.3	1	1.7
	80-100% minority	0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Upper Income	Less than 10% minority	1,023	769	26.3	16	20.5	83	27.3	128	29.5	27	31.8
	10-19% minority	1,735	1,332	45.5	45	57.7	128	42.1	192	44.2	38	44.7
	20-49% minority	1,068	824	28.2	17	21.8	93	30.6	114	26.3	20	23.5
	50-79% minority	0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
	80-100% minority	0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0

Disposition of Loan Applications by Characteristics of Census Tract												
Refinancing Loans												
	Cohort	Total Apps	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
Racial/Ethnic Composition	Less than 10% minority	4,023	1,963	35.9	200	34.6	838	34.3	692	31.8	330	30.6
	10-19% minority	3,822	1,864	34.1	175	30.3	735	30.1	700	32.1	348	32.3
	20-49% minority	2,945	1,284	23.5	155	26.8	611	25.0	580	26.6	315	29.2
	50-79% minority	761	300	5.5	44	7.6	187	7.7	159	7.3	71	6.6
	80-100% minority	195	57	1.0	4	0.7	71	2.9	48	2.2	15	1.4
Income Characteristics	Low income	381	138	2.5	13	2.2	108	4.4	87	4.0	35	3.2
	Moderate income	1,751	701	12.8	85	14.7	429	17.6	349	16.0	187	17.3
	Middle income	5,085	2,371	43.4	261	45.2	1,110	45.5	902	41.4	441	40.9
	Upper income	4,529	2,258	41.3	219	37.9	795	32.6	841	38.6	416	38.6
Low Income	Less than 10% minority	14	8	5.8	0	0.0	2	1.9	3	3.4	1	2.9
	10-19% minority	0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
	20-49% minority	0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
	50-79% minority	233	89	64.5	10	76.9	60	55.6	50	57.5	24	68.6
	80-100% minority	134	41	29.7	3	23.1	46	42.6	34	39.1	10	28.6
Moderate Income	Less than 10% minority	282	108	15.4	8	9.4	77	17.9	51	14.6	38	20.3

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	10-19% minority	280	123	17.5	12	14.1	55	12.8	58	16.6	32	17.1
	20-49% minority	703	285	40.7	33	38.8	172	40.1	136	39.0	77	41.2
	50-79% minority	425	169	24.1	31	36.5	100	23.3	90	25.8	35	18.7
	80-100% minority	61	16	2.3	1	1.2	25	5.8	14	4.0	5	2.7
Middle Income	Less than 10% minority	2,418	1,165	49.1	130	49.8	525	47.3	403	44.7	195	44.2
	10-19% minority	1,578	754	31.8	72	27.6	330	29.7	290	32.2	132	29.9
	20-49% minority	986	410	17.3	56	21.5	228	20.5	190	21.1	102	23.1
	50-79% minority	103	42	1.8	3	1.1	27	2.4	19	2.1	12	2.7
	80-100% minority	0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Upper Income	Less than 10% minority	1,309	682	30.2	62	28.3	234	29.4	235	27.9	96	23.1
	10-19% minority	1,964	987	43.7	91	41.6	350	44.0	352	41.9	184	44.2
	20-49% minority	1,256	589	26.1	66	30.1	211	26.5	254	30.2	136	32.7
	50-79% minority	0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
	80-100% minority	0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0

Disposition of Loan Applications by Characteristics of Census Tract												
Home Improvement Loans												
	Cohort	Total Apps:	Loans Originated		Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
		#	#	%	#	%	#	%	#	%	#	%
Racial/Ethnic Composition	Less than 10% minority	1,190	654	40.8	37	48.1	351	34.0	106	40.9	42	42.0
	10-19% minority	1,010	558	34.9	17	22.1	324	31.4	83	32.0	28	28.0
	20-49% minority	618	307	19.2	18	23.4	224	21.7	52	20.1	17	17.0
	50-79% minority	196	64	4.0	5	6.5	100	9.7	16	6.2	11	11.0
	80-100% minority	55	18	1.1	0	0.0	33	3.2	2	0.8	2	2.0
Income Characteristics	Low income	120	43	2.7	4	5.2	62	6.0	7	2.7	4	4.0
	Moderate income	419	170	10.6	12	15.6	193	18.7	29	11.2	15	15.0
	Middle income	1,398	740	45.2	35	45.5	449	43.5	130	50.2	44	44.0
	Upper income	1,132	648	40.5	26	33.8	328	31.8	93	35.9	37	37.0
Low Income	Less than 10% minority	14	5	14.0	0	0.0	7	11.3	1	14.3	0	0.0
	10-19% minority	0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
	20-49% minority	0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
	50-79% minority	64	22	51.2	4	100.0	31	50.0	4	57.1	3	75.0
	80-100% minority	42	15	34.9	0	0.0	24	38.7	2	28.6	1	25.0
Moderate Income	Less than 10% minority	87	47	27.6	4	33.3	25	13.0	8	27.6	3	20.0

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	10-19% minority	74	36	21.2	2	16.7	27	14.0	4	13.8	5	33.3
	20-49% minority	133	49	28.8	5	41.7	71	36.8	7	24.1	1	6.7
	50-79% minority	112	35	20.6	1	8.3	61	31.6	10	34.5	5	33.3
	80-100% minority	13	3	1.8	0	0.0	9	4.7	0	0.0	1	6.7
Middle Income	Less than 10% minority	726	395	53.4	22	62.9	216	48.1	67	51.5	26	59.1
	10-19% minority	429	223	30.1	8	22.9	155	34.5	33	25.4	10	22.7
	20-49% minority	223	115	15.5	5	14.3	70	15.6	28	21.5	5	11.4
	50-79% minority	20	7	0.9	0	0.0	8	1.8	2	1.5	3	6.8
	80-100% minority	0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Upper Income	Less than 10% minority	363	206	31.8	11	42.3	103	31.4	30	32.3	13	35.1
	10-19% minority	507	299	46.1	7	26.9	142	43.3	46	49.5	13	35.1
	20-49% minority	262	143	22.1	8	30.8	83	25.3	17	18.3	11	29.7
	50-79% minority	0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
	80-100% minority	0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0

The following tables list reasons for denial by race, ethnicity, gender, and income.

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Reasons for Denial of Applications by Race, Ethnicity, Gender, and Income																				
FHA, FSA/IRHS and VA Loans																				
Cohort	Total		Debt-to-Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit Application Incomplete		Mortgage Insurance Denied		Other	
	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Race	American Indian/Alaska Native	1	0	0	0	0	0	0	0	1	100	0	0	0	0	0	0	0	0	0
	Asian	2	0	0	0	0	0	0	0	1	50	0	0	1	50	0	0	0	0	0
	Black or African American	36	5	13	4	11	14	38	5	13	0	0	1	2	4	11	0	0	3	8
	Native Hawaiian or Other Pacific Islander	1	0	0	1	100	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	White	265	53	20	9	3	80	30	49	14	5	11	4	27	10	0	0	22	8	
	2 or more minority races	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Joint (White/Minority Race)	4	0	0	0	0	1	25	0	0	0	0	0	2	50	0	0	1	25	
	Race Not Available	88	17	19	8	9	18	20	14	15	7	7	6	10	11	0	0	8	9	
	Hispanic or Latino	95	20	21	7	7	29	30	17	17	5	5	3	3	8	8	0	0	6	6
Ethnicity	Not Hispanic or Latino	230	43	18	7	3	68	29	42	18	11	4	10	4	26	11	0	0	23	10

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Minority Status	Joint (Hispanic or Latino/Not Hispanic or Latino)	2	0	0	0	0	0	1	50	1	50	0	0	0	0	0	0	0	0	0	0	0	0	0
	Ethnicity Not Available	71	12	16	8	11	15	21	10	14	5	7	6	8	9	12	0	0	0	0	0	6	8	
Gender	White Non-Hispanic	189	37	19	5	2	52	27	37	19	10	5	8	4	21	11	0	0	0	0	19	10		
	Others, Including Hispanic	4	0	0	2	50	0	0	2	50	0	0	0	0	0	0	0	0	0	0	0	0		
	Male	161	27	16	7	4	41	25	33	20	10	6	6	3	22	13	0	0	0	0	15	9		
	Female	100	23	23	6	6	36	36	16	16	6	6	1	1	5	5	0	0	0	0	7	7		
	Joint (Male/Female)	87	14	16	5	5	26	29	13	14	2	2	7	8	10	11	0	0	0	0	10	11		
Income	Gender Not Available	50	11	22	4	8	10	29	8	16	3	6	5	10	6	12	0	0	0	0	3	6		
	Less than 50% of MSA/MD median	85	28	32	13	15	17	28	11	12	5	5	3	3	3	3	0	0	0	0	5	5		
	50-79% of MSA/MD median	108	22	20	3	2	31	28	24	22	9	8	5	4	9	8	0	0	0	0	5	4		
	80-99% of MSA/MD median	53	8	15	2	3	13	24	11	20	3	5	3	5	6	11	0	0	0	0	7	13		
	100-119% of MSA/MD median	35	6	17	2	5	7	20	8	22	0	0	2	5	7	20	0	0	0	0	3	8		
	120% or more of MSA/MD median	85	9	10	2	2	16	18	15	17	4	4	6	7	18	21	0	0	0	0	15	17		
	Income Not Available	32	2	6	0	0	29	90	1	3	0	0	0	0	0	0	0	0	0	0	0	0		

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Reasons for Denial of Applications by Race, Ethnicity, Gender, and Income																						
Conventional Loans																						
	Cohort	Total		Debt-to-Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit Application Incomplete		Mortgage Insurance Denied		Other		
		#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	
Race	American Indian/Alaska Native	3	0	0	0	0	0	0	0	2	66	0	0	0	0	1	33	0	0	0	0	
	Asian	33	15	45	2	6	0	0	0	4	12	3	9	1	3	3	9	0	0	5	15	
	Black or African American	25	9	36	1	4	6	24	6	24	0	0	1	4	1	4	0	0	1	4		
	Native Hawaiian or Other Pacific Islander	5	3	60	0	0	0	0	0	0	0	1	20	0	0	0	0	0	1	20		
	White	369	107	28	10	2	54	14	27	103	27	10	2	15	4	37	10	1	0	32	8	
	2 or more minority races	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	Joint (White/Minority Race)	9	3	33	0	0	0	0	0	2	22	0	0	0	0	3	33	0	0	0	0	
	Race Not Available	90	23	25	5	5	10	11	17	18	5	5	3	3	18	20	0	0	9	10		
	Hispanic or Latino	82	30	36	4	4	10	12	21	18	5	6	4	4	5	6	0	0	6	7		
	Not Hispanic or Latino	350	104	29	10	2	49	14	27	96	27	7	2	12	3	39	11	1	0	32	9	
Ethnicity																						

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Minority Status	Joint (Hispanic or Latino/Not Hispanic or Latino)	6	3	50	0	0	0	1	16	2	33	0	0	0	0	0	0	0	0	0	0	0	0	0
	Ethnicity Not Available	96	23	23	4	4	4	11	11	18	18	7	7	4	4	19	19	0	0	0	0	10	10	
Gender	White Non-Hispanic	289	77	26	7	2	43	14	85	29	6	2	10	3	35	12	1	0	0	0	25	8		
	Others, Including Hispanic	6	2	33	0	0	0	0	0	1	16	1	16	0	0	1	16	0	0	0	1	16		
Income	Male	224	74	33	7	3	27	12	59	26	9	4	8	3	23	10	0	0	0	0	17	7		
	Female	125	32	25	6	4	21	16	27	21	6	4	10	8	14	11	0	0	0	0	9	7		
Income	Joint (Male/Female)	135	40	29	3	2	20	14	39	28	1	0	2	1	14	10	1	0	0	0	15	11		
	Gender Not Available	43	9	20	2	4	3	6	9	20	3	6	0	0	12	27	0	0	0	0	5	11		
Income	Less than 50% of MSA/MD median	84	49	58	4	4	5	7	12	14	3	3	1	1	7	8	0	0	0	0	2	2		
	50-79% of MSA/MD median	124	35	28	9	7	16	12	37	29	5	4	2	1	9	7	0	0	0	0	11	8		
Income	80-99% of MSA/MD median	73	21	28	0	0	12	16	18	24	3	4	1	1	9	12	0	0	0	0	9	12		
	100-119% of MSA/MD median	53	13	24	0	0	11	20	10	18	2	3	3	5	8	15	1	1	1	5	9			
Income	120% or more of MSA/MD median	178	31	17	5	2	20	11	57	32	6	3	10	5	30	16	0	0	0	0	19	10		
	Income Not Available	22	11	50	0	0	6	27	0	0	0	0	0	3	13	0	0	0	0	0	2	9		

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Reasons for Denial of Applications by Race, Ethnicity, Gender, and Income																					
Refinancing Loans																					
	Cohort	Total	Debt-to-Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit Application Incomplete		Mortgage Insurance Denied		Other		
		#	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	
Race	American Indian/Alaska Native	10	7	70	0	0	1	10	0	0	0	0	0	0	2	20	0	0	0	0	
	Asian	29	8	27	0	0	6	20	10	34	0	0	0	0	3	10	0	0	2	6	
	Black or African American	62	10	16	2	3	15	24	14	22	5	8	0	0	7	11	0	0	9	14	
	Native Hawaiian or Other Pacific Islander	6	3	50	0	0	0	0	1	16	0	0	0	0	2	33	0	0	0	0	
	White	1077	237	22	6	0	261	24	256	23	25	2	20	1	165	15	1	0	106	9	
	2 or more minority races	3	1	33	0	0	2	66	0	0	0	0	0	0	0	0	0	0	0	0	
	Joint (White/Minority Race)	18	7	38	0	0	3	16	4	22	0	0	0	0	2	11	0	0	2	11	
	Race Not Available	397	70	17	3	0	53	13	111	27	4	1	3	0	111	27	0	0	42	10	
	Hispanic or Latino	140	48	34	1	0	27	19	26	18	2	1	2	1	21	15	0	0	13	9	
	Not Hispanic or Latino	1087	228	20	6	0	265	24	264	24	28	2	17	1	169	15	1	0	109	10	
Ethnicity																					

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Minority Status	Joint (Hispanic or Latino/Not Hispanic or Latino)	24	4	16	0	0	4	16	4	16	4	16	1	4	1	4	7	29	0	0	3	12
	Ethnicity Not Available	351	63	17	4	1	45	12	102	29	3	0	3	0	95	27	0	0	36	10		
Gender	White Non-Hispanic	962	204	21	5	0	235	24	236	24	22	2	18	1	145	15	1	0	96	9		
	Others, Including Hispanic	15	9	60	1	6	0	0	2	13	0	0	0	0	2	13	0	0	1	6		
Income	Male	536	129	24	3	0	114	21	116	21	8	1	8	1	99	18	1	0	58	10		
	Female	334	76	22	1	0	89	26	70	20	7	2	6	1	46	13	0	0	39	11		
	Joint (Male/Female)	472	93	19	4	0	110	23	141	27	16	3	7	1	76	16	0	0	35	7		
	Gender Not Available	252	44	17	3	1	27	18	77	30	2	0	2	0	70	27	0	0	27	10		
Income	Less than 50% of MSA/MD median	277	109	39	1	0	73	26	35	12	3	1	4	1	28	10	0	0	24	8		
	50-79% of MSA/MD median	324	82	25	4	1	74	22	66	20	7	2	3	0	54	16	1	0	33	10		
	80-99% of MSA/MD median	203	41	20	1	0	47	23	53	26	2	0	3	1	35	17	0	0	21	10		
	100-119% of MSA/MD median	190	36	18	2	1	38	20	58	30	4	2	2	1	34	17	0	0	16	8		
	120% or more of MSA/MD median	515	65	12	3	0	86	16	168	32	11	2	8	1	119	23	0	0	55	10		
	Income Not Available	93	10	10	0	0	23	24	16	17	7	7	3	3	22	23	0	0	12	12		

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Reasons for Denial of Applications by Race, Ethnicity, Gender, and Income																			
Home Improvement Loans																			
Cohort	Total	Debt-to-Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit Application Incomplete		Mortgage Insurance Denied		Other	
		#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Race	American Indian/Alaska Native	14	5	35	0	0	9	64	0	0	0	0	0	0	0	0	0	0	0
	Asian	19	10	52	0	0	6	31	1	5	0	1	5	0	0	0	0	1	5
	Black or African American	64	16	25	0	0	44	68	2	3	0	0	0	0	0	0	0	2	3
	Native Hawaiian or Other Pacific Islander	8	3	37	0	0	4	50	0	0	0	0	0	0	0	0	0	1	12
	White	636	159	25	5	0	343	53	70	11	9	1	4	0	16	2	0	30	4
	2 or more minority races	3	0	0	0	0	1	33	2	66	0	0	0	0	0	0	0	0	0
	Joint (White/Minority Race)	10	1	10	0	0	5	50	3	30	0	0	0	0	0	0	0	1	10
	Race Not Available	100	29	29	0	0	54	54	8	8	1	1	0	2	2	0	0	6	6
	Hispanic or Latino	125	31	24	0	0	76	60	8	6	1	0	0	2	1	0	0	7	31
	Not Hispanic or Latino	637	167	26	5	0	341	53	68	10	8	1	5	16	2	0	0	27	167
Ethnicity																			

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Minority Status	Joint (Hispanic or Latino/Not Hispanic or Latino)	9	0	0						7	77	0	0	1	11	0	0	0	0	0	0	1	0
	Ethnicity Not Available	85	25	29	0	0	0	0	44	51	9	10	0	0	0	0	0	1	1	0	0	6	25
Minority Status	White Non-Hispanic	554	141	25	5	0			291	52	62	11	8	1	4	0	16	2	0	0	27	141	
	Others, Including Hispanic	21	8	38	0	0	0	0	11	52	0	0	0	0	0	0	0	0	0	0	2	8	
Gender	Male	363	89	24	4	1			206	56	28	7	5	1	4	1	13	3	0	0	14	89	
	Female	242	67	27	1	0	0	0	150	61	12	4	1	0	1	0	4	1	0	0	6	67	
	Joint (Male/Female)	203	48	23	0	0	0	0	90	44	42	20	4	1	0	0	1	0	0	0	18	48	
	Gender Not Available	46	18	39	0	0	0	0	21	45	3	6	0	0	0	0	1	2	0	0	3	18	
Income	Less than 50% of MSA/MD median	175	67	38	2	1			87	49	7	1	2	1	1	0	1	0	0	0	8	67	
	50-79% of MSA/MD median	176	54	30	0	0	0	0	103	58	7	3	1	0	0	0	3	1	0	0	8	54	
	80-99% of MSA/MD median	114	37	32	2	1	0	0	52	45	15	13	1	0	0	0	3	2	0	0	4	37	
	100-119% of MSA/MD median	81	17	20	0	0	0	0	47	58	8	9	2	2	1	1	3	3	0	0	3	17	
	120% or more of MSA/MD median	254	44	17	1	0	0	0	129	50	47	18	3	1	3	1	9	3	0	0	18	44	
	Income Not Available	56	4	7	0	0	0	0	50	89	1	1	1	1	0	0	0	0	0	0	0	4	

4. Insurance

There was not suitable data available to determine if discrepancies existed in the rates and amounts of insurance coverage available to minority households in the Cities of Allentown, Bethlehem, Easton, and Northampton County. Further investigation and assessment are needed to determine if housing insurance is a significant barrier to fair housing choice in the area.

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D. Citizen Participation:

The Cities of Allentown, Bethlehem, Easton, and Northampton County developed the Analysis of Impediments with input received through individual meetings and public meetings with a variety of stakeholders and representatives of the community which included representatives from the Cities and County; Housing Authority; community, social service, and advocacy agencies; and non-profit and for profit entities.

The County advertised and held three (3) public hearings on the impediments to fair housing choice in the City of Allentown, the City of Bethlehem, and the City of Easton that provided residents with the opportunity to discuss the County's AI and to offer their suggestions. The County held four (4) Needs Public Hearings on February 6, 2019, February 13, 2019, February 27, 2019, and March 6, 2019 to discuss fair housing issues. The draft AI was placed on public display.

In the "Citizen Participation" section of the Appendix is a complete documentation of all input received during the AI development period.

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